

# ***Full Privacy Notice***

(Applicable to users/customers whilst being in the European Union wishing to access our Services)

Our Privacy Notice was last updated on 06-Apr-2020

## **Introduction**

We/Big Big Channel Limited (BBCL) (*see note below*) respect your privacy and are committed to protecting your privacy. This Privacy Notice tells you how we collect use and hold personal information about you when you register as a BBCL user to access our products and/or services, use our website [www.bigbigchannel.com.hk](http://www.bigbigchannel.com.hk) (“**Website**”), mobile apps, our services, and/or access/subscribe/download contents whilst you are in the European Union (EU). Information about you may be collected in paper form, by telephone, online, by email, or via other electronic means, for examples: when you use our Website to subscribe for products or services, activate/download/enable our mobile app(where applicable), or when you create or log into your Big Big Channel(*see note below*) account to access our interactive services (together the “**Service**”) whilst you are in the EU.

This Privacy Notice was last updated on the above date and incorporates the new European privacy law under the General Data Protection Regulation (EU) 2016/679, which came into effect on 25 May 2018 (“**Data Privacy Law**”). We are working towards enhancing our systems to meet these changes as they may be applicable in relation to those service users/customers wishing to access our Services whilst they are in the EU.

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy.

**Note:** Big Big Channel is a service provided by Big Big Channel Limited (a company incorporated in Hong Kong). BBCL user account adopts a single log in credential and user account authentication (“**Single Log-in Function**”) via the TVB member ID service provided by Television Broadcasts Limited (TVB) (TVB is a company incorporated in Hong Kong and is the parent company of BBCL) to facilitate users accessing online services offered by applicable companies within the TVB group of companies using the Single Log-in Function (“**TVB Companies with Single Log-in Function**”).

## **Contents**

### Data Privacy Overview

- A. Important information and who we are and contact details “[click here](#)”
- B. The information we collect about you “[click here](#)”
- C. How is your personal data collected “[click here](#)”
- D. How we use your personal data “[click here](#)”
- E. Disclosures of your personal data “[click here](#)”
- F. International transfers “[click here](#)”
- G. Data security “[click here](#)”
- H. Data retention “[click here](#)”
- I. Your legal rights “[click here](#)”
- J. General “[click here](#)”

K. Glossary “[click here](#)”

# Data Privacy Overview

(Applicable to users/customers whilst being in the European Union wishing to access our Services)

Our Privacy Notice was last updated on 20-Nov-2018

## The controller responsible for the personal data we hold about you

We/Big Big Channel Limited (BBCL) (*see note below*) respect your privacy and are committed to protecting your privacy.

This gives an overview of our Privacy Notice on how we collect use disclose transfer and store your personal data while you are in the European Union (“EU”). To incorporate the new privacy law under the General Data Protection Regulation (EU) 2016/679 which came into effect on 25 May 2018 (Data Privacy Law), we are working towards enhancing our systems to meet these changes as they may be applicable in relation to those users/customers who access our products or services whilst they are in the EU.

Big Big Channel Limited is the controller responsible for the Website, the Service (as defined in the Introduction paragraph of the Full Privacy Notice), and for the personal information we collect use and hold about you as data controller (*controller*).

As to the specific items of your Identity and Contact information collected by and held in the Single Log-in Function of your TVB member ID service user account for accessing our Service, they are managed by our parent company Television Broadcasts Limited (TVB) as “*data controller*” and “*data processor*” (see [Section D, paragraph 5.2](#) of the Full Privacy Notice below for more details).

**Note:** Big Big Channel is a service provided by Big Big Channel Limited (a company incorporated in Hong Kong).

### Overview contents

1. Data Privacy Law and our approach towards protecting your personal information
2. Your personal information and the Purposes for which we use your personal information
3. International transfers
4. Accessing correcting or updating your personal information
5. Your Legal Rights
6. Contact Us and further information

## 1. Data Privacy Law and our approach towards protecting your personal information

The Data Privacy Law protects your privacy and ensures that the personal information that we hold about you is processed fairly and lawfully.

Personal information is data that can identify you, such as your name, address, and contractual details. It does not include data where the identity has been removed (anonymous data). We are

obliged to observe the six Data Privacy Law principles when we collect use disclose transfer and store your personal information to ensure the data shall be :-

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with the initial purposes;
- adequate, relevant and not excessive;
- accurate and kept up to date;
- kept in a form which permits identification of the individual for no longer than is necessary;
- processed in a manner that ensures appropriate security of the personal data.

## 2. **Your personal information and the Purposes for which we use your personal information**

We may collect, use, store and transfer the following different kinds of personal data about you: Identity Data, Contact Data, Financial Data, Transaction Data, Technical Data, Profile Data, Usage Data, Marketing and Communications Data.

We explain these categories of data in *Section B (The information use collect about you)* of our Full Privacy Notice. [click here](#).

We use different methods to collect data about you, which are explained in Section C (How is your personal data collected) of the Full Privacy Notice [click here](#).

We will only use your personal information when the law allows us to. Personal information which you provide to us or we collect from you or from a third party will be kept securely and will be used for purposes stated when the information is collected. For examples, we will use your personal information in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to progress financial transactions.
- To allow statistical analysis of information so we can plan the provision of Service:-
  - we will retain your transaction history and use details of the product(s) you have previously purchased to make suggestions to you for other product(s) that we believe would also be of interest to you.
  - we will retain and evaluate information on your recent visits to our Website and how you move around different web pages (and how you use our Service) for analytic purposes to understand how you use our Website and/or Service so that we can make the Website (and Service) more intuitive.
  - we will keep a record of content(s) that you have clicked on via the Service, watched, or subscribed and use that information to target advertising to you that is relevant to your interests, which we have identified based on such information.
- Where it is necessary for our legitimate interests (or those of a third party) and that your interests and fundamental rights do not override those interests. Please see the table below paragraph 1.4 of Section D (How we use your personal data) and [click here](#) to learn more

about what we mean by legitimate interests and when we process your data for our legitimate interests.

- Where we need to comply with a legal or regulatory obligation.

Please [click here](#) (i.e. paragraph 1.4 Section D of the Full Privacy Notice) to learn more about the ‘purposes’ for which we may use your personal information when we process your data.

### ***Consent***

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you. Please see paragraph 2, Section D (*how we use your personal data*) of the Full Privacy Notice for further details by [clicking here](#).

Where we need to collect personal information by law, or under the terms of a contract or subscription we have with you and you decline to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In such event, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

For a description of the purposes we plan to use your personal information, and which of the legal bases we rely on to do so, and what our lawful basis/legitimate interests are where appropriate are set out in the table below paragraph 1.4, Section D (*How we use your personal data*) of the Full Privacy Notice, please [click here](#).

### ***Third-party links***

Our Website and Service may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. **We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website or Service, we encourage you to read the privacy policy of every website you visit.**

## **3. International transfers**

We may transfer, store and process your personal data outside the EU/European Economic Area. More detail can be found in Section F of our Full Privacy Notice, please [click here](#).

## **4. Accessing, correcting or updating your personal information**

You can access correct delete modify or update your registration, personal information and marketing preferences by:

- Log onto your user account via the Big Big Channel mobile app or visit our Website at [www.bigbigchannel.com.hk](http://www.bigbigchannel.com.hk). If you have subscribed for more than one of our services, you may need to update other ‘service or application’ specific item(s) of personal information each separately.
- Sign into your TVB member ID user account via the mobile app of TVB Group company(ies) which require or accept TVB member ID credential for account log-in authentication (TVB

Companies with Single Log-in Function). If you have subscribed for more than one of our services of TVB Companies with Single Log-in Function, you may need to update other 'service or application' specific item(s) of personal information each separately;

- Emailing our 'Data Protection Team at 'Big Big Channel Limited [data.protection@bigbigchannel.com.hk](mailto:data.protection@bigbigchannel.com.hk)'.

## 5. Your Legal Rights

Under certain circumstances, you have rights under data privacy laws in relation to your personal data including the right to receive a copy of the personal data we hold about you and the right to make a complaint at any time to the relevant competent 'supervisory authority' in the EU for data protection issues under the General Data Protection Regulation (EU) 2016/679 (Data Privacy Law). We would, however, appreciate the chance to deal with your concerns by [contacting us](#) before you approach the supervisory authority so please contact us in the first instance.

You are entitled to:

- Find out what personal information we hold about you,
- Ask for out of date or inaccurate data to be updated, corrected, erased, or destroyed,
- Request that we do not use personal information to send you marketing information,
- Request that decisions about you are not made solely by an automated process,
- Request that we provide a copy of personal data you have provided to us and in a format which will allow you to transfer the data to another data controller,
- Request that we cease to process (or suspend processing) your data if you believe that the processing will cause you harm or distress

More detail can be found in Section I (Your legal rights) of our Full Privacy Notice, please [click here](#).

## 6. Contact Us and further information

If you wish to exercise your legal rights in respect of the personal information we hold about you, please contact us by email at [data.protection@bigbigchannel.com.hk](mailto:data.protection@bigbigchannel.com.hk) or write to: for the attention of the Data Protection Team at Big Big Channel Limited, Level 4 & 5, Production Centre of Shaw Studio, 201 Wan Po Road, Tseung Kwan O, Kowloon, Hong Kong. For your protection, we may need to verify your identity before implementing your request.

Please contact us immediately should you have reason to believe that the security of any of your account with us might have been compromised.

For more information on how we process your personal data including on data security, data retention and lawful processing bases, please access and see Sections G (Data Security) please [click here](#) and H (Data Retention) please [click here](#) of our Full Privacy Notice.

## A. Important Information and Who We Are [\[Top\]](#)

### 1 Purpose of this Privacy Notice

- 1.1 This Privacy Notice aims to give you information on how we collect and process personal information about you through your use of the Website and/or the Service, including any data you may provide to us when you use or purchase our product(s) or services, register as a

subscriber, access our Service, visit our Website, download/activate/ enable our app, or take part in any of our contest.

- 1.2 It is important that you read this Privacy Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing information about you, so that you are fully aware of how and why we are using such information. This Privacy Notice supplements other notices and is not intended to override them.

## **2 Controller of personal information**

- 2.1 Big Big Channel Limited/BBCL is the controller responsible for the Website, the Service, and for the personal information we collect use and hold about you (together “we”, “us” or “our”<sup>1</sup>). We may share your personal information with our parent company Television Broadcasts Limited (“TVB”) and affiliates and associated companies within the group of companies of Television Broadcasts Limited (“TVB Group”) for processing purposes. Details of the legal entities within the TVB Group can be found in the annual report of Television Broadcasts Limited (<http://corporate.tvb.com/upload/article/en/cb74bfb161bb59b766ce147904953ea7.pdf>).

- 2.2 The specific items of your Identity and Contact information collected by and held in the Single Log-in Function of your TVB member ID service user account for accessing our Service are managed by our parent company Television Broadcasts Limited (TVB) as “data controller” and “data processor” (see [Section D, paragraph 5.2](#) of the Full Privacy Notice below for more details). Any update you make to such information will be synchronized to update the relevant items of your Identity and Contact information held in your BBCL user account, your user account with TVB member ID service, as well as your other user account(s) that you have set up with such other TVB Companies with Single Log-in Function (please see [Section D, paragraph 5.2](#) below for more details). [Click here](#) for a list of TVB Companies with Single Log-in Function<sup>2</sup>.

## **3 Contact Details**

Our contact details are:

**For the attention of: Data Protection Team, Big Big Channel Limited**

Email Address: [data.protection@bigbigchannel.com.hk](mailto:data.protection@bigbigchannel.com.hk)

Postal Address: Level 4 & 5, Production Centre of Shaw Studio,  
201 Wan Po Road,  
Tseung Kwan O, Kowloon,  
Hong Kong

## **4 Changes to this Privacy Notice and your duty to inform us of changes**

- 4.1 We regularly review this Privacy Notice and this version was last updated on 20-Nov-2018. Where applicable historic versions are archived [here](#) at <https://bigbigchannel.com.hk/en/eupn> OR can be obtained by [contacting us](#).
- 4.2 It is important that the personal information we hold about you is accurate and current. You can access correct delete modify or update your registration, personal information and marketing

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<sup>1</sup> When we mention “we”, “us” or “our” in this privacy notice we are referring to Big Big Channel Limited who is the controller of your personal data and is responsible for processing your personal information.

<sup>2</sup> This list will be updated from time to time to reflect participating TVB Group Companies offering services access using the Single Log-in Function.

preferences by logging on your user account via the Big Big Channel mobile app or visit our website at [www.bigbigchannel.com.hk](http://www.bigbigchannel.com.hk). Alternatively, you can also access correct delete modify or update your registration, personal information and marketing preferences by signing onto your TVB member ID user account via the TVB member ID app, or visit our Website [www.bigbigchannel.com.hk](http://www.bigbigchannel.com.hk).

If you have subscribed for more than one of our Services or services of other companies in the TVB Group and that there are other changes in the ‘services/app(s)’ specific item(s) of personal information, you may need to update each separately. Alternatively, please write to us by emailing our Data Protection Team, Big Big Channel at [data.protection@bigbigchannel.com.hk](mailto:data.protection@bigbigchannel.com.hk) and tell us if your personal information changes during your relationship with us.

## **B. The Information We Collect About You** [\[Top\]](#)

Personal information or personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

### ***1 What information we collect***

1.1 We may collect, use, disclose, transfer and store different kinds of personal information (personal data) about you. We have grouped them together in the following category:

- ❖ **Identity Information** such as:
  - First name
  - Last (surname) name
  - Nickname/pseudonym/assumed name (relevant for accessing the interactive features of the Service)
  - Email address
  - Year of Birth (optional)
  - Month of Birth (optional) (*for special birthday month greeting*)
  - Contact number
  - Gender
  - Password
  
- ❖ **Contact Information** such as:
  - Delivery address(via BigBigShop)
  - Email address
  - Contact number
  
- ❖ **Financial Information** such as:
  - Payment records related financial information (where applicable)
  
- ❖ **Transaction Information** such as:
  - Payment record from end customer
  - Payment method
  - Detail of products and services customer have purchased from us or business partner
  
- ❖ **Technical Information** such as your:
  - Internet protocol (IP) address
  - Login data
  - Browser type and version
  - Time zone settings and location
  - Operating system and platform

- Other technologies in the device you use to log in to websites and services

❖ **Profile Information** such as:

- First name,
- Last (surname) name
- Nickname/pseudonym/assumed name (relevant for accessing the interactive features of the Service)
- Gender
- Year of Birth (optional)
- Month of Birth (optional) (*for special birthday month greeting*)
- *Email address*
- Contact number
- Marketing and Communications preferences.

❖ **Usage Information** such as:

- Downloading history
- Video playback history
- Bookmarked record
- Favorite product
- User comments or like on video
- User's gifting

(a) **Marketing and Communications Information** such as:

- Marketing and communications preferences.

Please see the table under [paragraph 1.4 of Section D](#) (*How we use your personal data*) below [click here](#) for a description of the purposes we plan to use your personal data and the lawful bases/legitimate interest we rely on to do so.

- 1.2 We also collect, collate, use and share **Statistical Information** such as analytical or demographic data for any purpose. Statistical Information could be derived from the personal information about you but is not considered personal data in law as this information will not directly or indirectly reveal your identity. For example, we may make use of your Usage Information to calculate the percentage of users accessing a specific service or website feature. However, if we combine or connect Statistical Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used in accordance with this Privacy Notice.
- 1.3 We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.
- 1.4 Where we need to collect personal data by law, or under the terms of a contract we have with you and you decline to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In such event, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2. **Third party data**

You may occasionally need to provide personal information about other individual(s) to us. In each of such event, you are required to first obtain the express authorization of such individual(s) before using, disclosing and transferring their personal information to us for the relevant purposes. We may require you to provide us with any supporting documents which may be



necessary to prove such authorization. You should also advise such individual(s) that we may contact such individual(s) for further information.

## C. How We Collect Your Personal Data [\[Top\]](#)

We use different methods to collect data from and about you including through:

- **Direct interactions** (information you give us). You may give us your Identity, Contact and Financial Information by filling in forms on our Website, downloading/enabling our mobile app, by corresponding with us by post, phone, email, and other electronic means or otherwise. This includes personal data you provide when you:
  - apply for our product(s) or services;
  - purchase our product(s);
  - create an account in our Website or mobile app;
  - provide delivery address of purchased product(s);
  - request marketing materials to be sent to you;
  - enter a contest, promotion, survey or mini-game;
  - engage in interactive communications with us;
  - engage in the interactive feature of the Service;
  - contact our customer services; or
  - give us feedback.
- **Automated technologies or interactions.** As you browse or interact with the Website or mobile app(s), or use any of our product(s) or services (for example, when you visit our Website or activate/enable/use our mobile app(s), or when you create or log in to your Big Big Channel account or your other on-line services user account with other TVB Group company(ies) using the TVB member ID credential), we may automatically collect Technical Information about your device, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Information about you if you visit other websites employing our cookies, server logs or other similar technologies. Cookies and those similar technologies allow us to analyze web traffic and evaluate how you move around for analytics purposes to understand how you and other users use it so that we can make it more intuitive. Please see our **COOKIE POLICY** ([https://bigbigchannel.com.hk/en/cookies\\_policy](https://bigbigchannel.com.hk/en/cookies_policy)) for further details.
- **Third parties or publicly available sources.** To the extent permitted by applicable law, we will receive personal data about you from various third parties and publicly available services as set out below:

- Technical Information from the following parties:
  - (a) analytics providers
    - i. Google Inc. based outside the EU;
    - ii. NicePeopleAtWork based inside the EU;
    - iii. AC Nielsen based outside the EU;
    - iv. Facebook based outside the EU;
    - v. Emarsys based outside the EU;
    - vi. Google Ad Remarketing based outside the EU.
  - (b) advertising networks
    - i. DoubleClick based outside the EU
    - ii. Google Analytics based outside the EU
- Contact, Financial and Transaction Information from providers of technical, payment and delivery services:
  - (a) Apple Inc. based outside the EU
  - (b) Google Inc. based outside the EU
  - (c) AsiaPay Limited based outside the EU
  - (d) mPay Limited based outside the EU
  - (e) Alipay based outside the EU
  - (f) Union Pay based outside the EU
  - (g) WeChat Pay based outside the EU
- Cloud system
  - (a) Google Inc. based outside the EU
- **Link to third party sites or apps.** Our Service may be linked to third party sites or apps which may carry third party advertising marketing materials, applications, functionality or other features (“**materials**”). Please note that we are not responsible for any third party sites, mobile apps or materials, you should check and read the privacy policy of the relevant third party when you access or click on such materials or sign up any third party special offer. When you leave our Website or Service, we encourage you to read the Privacy Policy of every Website you visit.
- **Telephone call.** We will inform you if we monitor or record any telephone conversations between you and us for security reason, for record keeping of the transaction and/or for staff training purposes.

## **D. How We Use Your Personal Data** [\[Top\]](#)

### **1. We will only use your personal data in the following circumstances**

- 1.1 We will only use your personal data when the law allows us to.
- 1.2 Personal information which you provide to us or we collect from you or from a third party will be kept securely and will be used for purpose(s) stated when the information is collected. For examples, we will use your personal information in the following circumstances:
  - Where we need to perform the contract we are about to enter into or have entered into with you:-
    - we use the information collected to provide the Service to you, including: fulfilling your subscription, creating and managing your account(s) with us, sending information to you about your relationship and transactions with us, allowing you to communicating with us updating the information we hold about you (where applicable,

including the information relevant to the single login authentication functionality as held by other mobile app(s) of the relevant TVB Group companies).

- Where we need to progress financial transactions.
- To allow statistical analysis of information so we can plan the provision of Service:-
  - we will retain your transaction history and use details of the product(s) you have previously purchased to make suggestions to you for other product(s) or that we believe would also be of interest to you.
  - we will retain and evaluate information on your recent visits to our Website and how you move around different web pages (and how you use our Service) for analytics purposes to understand how you use our Website and Service so that we can make the Website (and Service) more intuitive.
  - we will keep a record of content(s) that you have clicked on via the Service, watched, or subscribed and use that information to target advertising to you that is relevant to your interests, which we have identified based on such information.
- Where it is necessary for our legitimate interests (or those of a third party) and that your interests and fundamental rights do not override those interests:-
  - we may use your personal data where we believe to be necessary or appropriate in order to protect, enforce, or defend the legal rights/contractual obligations, privacy, safety, or property of Big Big Channel, Television Broadcasts Limited, the TVB Group or their employees, agents and contractors; protect the safety, privacy, and security of users of our Service to the extent permitted by applicable law.
  - protect against fraud or other unlawful activity or for risk management purposes to the extent permitted by applicable law.
- Where we need to comply with a legal or regulatory obligation.

### ***Consent***

- 1.3 Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. Please see paragraph 2 below for further details. You have the right to withdraw consent to marketing at any time by [contacting us](#).

### ***Purposes for which we use your personal data***

- 1.4 A description of the purposes we plan to use your personal data, and which of the legal bases we rely on to do so, and what our lawful basis/legitimate interests are where appropriate are set out in the table below.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|     | <b>Purpose/Activity</b>   | <b>Data<sup>3</sup> Category</b>   | <b>Lawful basis/Legitimate Interest</b>   |
|-----|---|--|---|
| (a) | <p>To register you as a new customer and/or user with a single login identification credential (TVB member ID service), administer and/or manage user account registration and your personal data held in your user account:</p> <ul style="list-style-type: none"> <li>To enable you to access our Service;</li> <li>To facilitate you to access online services offered by the applicable companies within the TVB Group which accept or require TVB member ID credential to log in;</li> <li>To facilitate your sharing of information between the Service and your social media account(s) to the extent as you connect or have set up linkage between your user account with us and your social media account(s).</li> </ul> | <ul style="list-style-type: none"> <li>Identity</li> <li>Contact</li> </ul>  | <ul style="list-style-type: none"> <li>Performance of a contract with you or to take steps to enter into a contract with you</li> <li>Necessary for complying with service pledges</li> <li>Necessary for our legitimate interests in keeping our records updated, enhancing or improving your experience as a registered user of TVB member ID credential authentication service in using our products, accessing our services and, where applicable, other services offered by the applicable TVB Group companies which accept TVB member ID to login.</li> </ul> |
| (b) | <p>To process and delivery your order including:</p> <ul style="list-style-type: none"> <li>Manage payments, fees and charges.</li> </ul>   | <ul style="list-style-type: none"> <li>Identity</li> <li>Contact</li> <li>Transaction</li> <li>Marketing and Communications</li> </ul> | <ul style="list-style-type: none"> <li>Performance of a contract with you</li> <li>Necessary to comply with a legal obligation</li> <li>Necessary for our legitimate interests in recovering debts due to us</li> </ul>   |

<sup>3</sup> Please see paragraph 1, Section B (*The information we collect about you*) above for the different kinds of personal data in each 'data category'.

|     |  |   |   |
|-----|--|---|---|
| (c) | <p>To manage our relationship with you including:</p> <ul style="list-style-type: none"> <li>• Tell you about changes to our terms or privacy policy;</li> <li>• Tell you about changes to our products/services;</li> <li>• Ask you to leave a review or take a survey.</li> </ul>                            | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Marketing and Communications</li> </ul>                  | <ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests in keeping our records updated, studying how customers use our products or services, enhancing or improving our services or communications for the benefit of our customers, and identifying and preventing fraud</li> </ul> |
| (d) | <p>To enable you to take part in a contest, prize draw, complete a survey, other interactive communication with us.</p>  | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Usage</li> <li>• Marketing and Communications</li> </ul> | <ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests in studying how customers use our products or services, developing and growing our business, and determining the effectiveness of promotional campaigns and advertising</li> </ul>  |
| (e) | <p>To administer and protect our business, the Website and the Service, including:</p> <ul style="list-style-type: none"> <li>• troubleshooting;</li> <li>• data analysis;</li> <li>• testing;</li> <li>• system maintenance;</li> <li>• support;</li> <li>• reporting;</li> <li>• hosting of data.</li> </ul> | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> </ul>  | <ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests in running our business, provision of administration and IT services, ensuring network and information security, preventing fraud, and in the context of a business reorganization or group restructuring exercise</li> </ul>  |

|     |   |  |  |
|-----|---|--|--|
| (f) | <p>To deliver relevant content marketing materials and advertisements to you and measure or analyze the effectiveness of the advertising we serve to you.</p>   | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Technical</li> </ul> | <ul style="list-style-type: none"> <li>• Necessary for our legitimate interests in studying how customers use our products or services, developing and growing our business, and marketing our products or services to existing customers to increase sales</li> <li>• Necessary for our legitimate interests in studying your shopping history and usage of products purchased to make suggestions to you for other products which we believe you will also be interested in</li> </ul>   |
| (g) | <p>To use data analytics to</p> <ul style="list-style-type: none"> <li>• improve the Website, the Service, advertising, marketing, customer relationships and experiences;</li> <li>• conduct research in relation to the Service we provide;</li> <li>• enable us to better understand the demographics of our users;</li> <li>• perform statistical analysis of your behavior and interest in any Services we provide.</li> </ul> | <ul style="list-style-type: none"> <li>• Technical</li> <li>• Profile</li> <li>• Usage</li> </ul>  | <ul style="list-style-type: none"> <li>• Necessary for our legitimate interests in defining types of customers for our products/services, keeping the Website updated and relevant, enhancing, personalizing or otherwise improving our products/services for the benefit of our customers, and formulating our marketing strategy</li> <li>• Necessary for our legitimate interests in evaluating information on your visits to our Website and how you move around for analytics purposes to understand how you and other users use it so that we can make it more intuitive</li> <li>• Necessary for our legitimate interests in studying how customers use our products or services, to enable us to develop and grow our business, to enhance modify or personalize or otherwise improve our services or communications for the benefit of our customers and in determining the effectiveness of promotional campaigns and advertising</li> </ul> |

|     |   |  |   |
|-----|---|--|---|
| (h) | <p>To make suggestions and recommendations to you about goods and services that may be of interest to you, for example, we have an interest in making sure the marketing/marketing materials we distribute is relevant for you, so we may process your information to:</p> <ul style="list-style-type: none"> <li>• send you marketing that is tailored to your interest;</li> <li>• provide other Services better tailored to your needs.</li> </ul> | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Usage</li> <li>• Technical</li> <li>• Marketing and Communications</li> </ul> | <ul style="list-style-type: none"> <li>• Necessary for our legitimate interests in developing our business, and marketing our products/services to existing customers to increase sales</li> <li>• Necessary for our legitimate interests in using the record of the content(s) or offer(s) that you have clicked on or watched or subscribed to target advertisement to you that is relevant to your interest, which we have identified based on content(s) you have watched or subscribed or offer(s) that you have clicked on</li> </ul> |
|-----|---|--|---|

## 2. *Marketing and promotional offers*

- 2.1 We strive to provide you with choices regarding certain personal data uses particularly around marketing and advertising.
- 2.2 We may use your Identity, Contact, Technical, Usage and Profile Information to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (“**marketing**”).
- 2.3 We have an interest in making sure our marketing is relevant for you to enable us to enhance modify or otherwise improve our service /communication for the benefit of our customers/users to determine the effectiveness of our personalized campaigns and advertising, so we may process your information to send you marketing that is tailored to your interest. If you have any concerns about personalized or interest based marketing, you have the right to object to processing that is based on our legitimate interest. For more information on your right, please see [Section 1](#) (Your Legal Right) below.

### *Marketing from us*

- 2.4 You will receive marketing communications from us if you have requested the information from us, or if you have purchased similar goods and services from us and that you have not opted out of receiving marketing information. We will obtain your consent before using your information for sending other marketing communications to you. If you provide your mobile phone number to us, we may ask for your consent to receive text message alerts from us containing goods, services, event, or promotional information in a text or SMS. You have the right to object to processing your information for direct marketing purposes. You can also log into your user account via the relevant mobile app(s) that you have subscribed to adjust your marketing preferences or by following the opt-out link provided on any marketing messages sent to you, or alternatively, you can ask us to adjust by [contacting us](#) by email us at [data.protection@bigbigchannel.com.hk](mailto:data.protection@bigbigchannel.com.hk) at any time to *update your preferences*.

### ***On-line interest-based direct marketing***

- 2.5 To the extent as required by applicable law, we will obtain your consent before using your personal information for on-line interest-based direct marketing. If you have any concerns about personalized or interest based marketing, you have the right to object to processing your information for direct marketing purposes. You can adjust and *update your on-line interest-based advertising preferences* at any time by adjusting your internet browser setting. To learn how to opt out of online interest-based advertising, please see section 3 (Cookies) below and follow the instructions given in our COOKIE POLICY ([https://bigbigchannel.com.hk/en/cookies\\_policy](https://bigbigchannel.com.hk/en/cookies_policy)). Please read Section I (Your Legal Rights) below,

### ***Third party marketing and consent***

- 2.6 We will get your express opt-in consent before we share your personal data with any third party for direct marketing purposes.

### ***Opting out***

- 2.7 You can ask us or third parties to stop sending you marketing message at any time by checking relevant boxes to adjust your marketing preferences by following the opt-out links provided on any marketing messages sent to you or *by contacting our Data Protection Team [data.protection@bigbigchannel.com.hk](mailto:data.protection@bigbigchannel.com.hk)* to update your preferences.
- 2.8 Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration (where applicable), product or service experience or other transactions.

### ***Third party on-line marketing***

- 2.9 For third party on-line marketing, you can adjust and *update your third party on-line marketing preferences* at any time by adjusting your internet browser setting. To learn how to opt out of such third party marketing advertising, please see *section 3 (Cookies)* below and follow the instructions given in our COOKIE POLICY ([https://bigbigchannel.com.hk/en/cookies\\_policy](https://bigbigchannel.com.hk/en/cookies_policy)).

### ***If you normally live outside the EU and use our Service whilst you are in the EU***

- 2.10 If you access or seek to access our Service away from your home country (i.e. relevant to customers/users who usually reside outside the EU) and to the extent required by the Data Privacy Law, we will obtain your express '*opt-in consent*'; or, if applicable, your express '*enhanced opt-in consent*' (*see Note below*) before using your personal information for sending you personalised marketing while you are staying in the EU area. You can adjust and update your marketing preferences at any time by logging into your user account and checking the relevant boxes to adjust your marketing preferences or by following the opt-out links provided on any marketing messages sent to you or by *contacting our Data Protection Team [data.protection@bigbigchannel.com.hk](mailto:data.protection@bigbigchannel.com.hk)* at any time.

**Note:** *Any such 'opt-in consent' or 'enhanced opt-in consent' you provide shall apply to any personalised marketing that you may receive from us and/or via our Service for the duration of your stay within the EU. Any 'direct marketing consent and advertising preferences' you have previously given will remain effective and unaffected. We will continue to rely on such advertising preferences (for marketing outside EU) you have set earlier. You can adjust and update your marketing preferences at any time, please refer to paragraph 2.7 of Section D (How we use your personal data) [click here](#).*



### 3. ***Cookies***

- 3.1 Our Service uses cookies and other similar tracking technologies (“**Cookie**”) to ensure efficient functioning and provide you a service in line with your preferences. A Cookie is a string of information that is sent by a website and stored in the computer or device memory. We use Cookie technology to help log visitors to our Website and Service, to assist us in service provision or improve our Service, and to make our Website and Service and the advertising displayed on it more relevant to your interests. We also use cookies and related technology on third party websites, mobile sites and apps to show you personalized marketing based on data collected by those cookies.
- 3.2 You can set your internet browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Website or Service may become inaccessible or not function properly. For more information about the Cookie we use or to learn how adjust your internet browser setting, please follow the instructions given in our **COOKIE POLICY** ([https://bigbigchannel.com.hk/en/cookies\\_policy](https://bigbigchannel.com.hk/en/cookies_policy)).

### 4. ***Using our Website, mobile apps and service***

- 4.1 We regularly review this Privacy Notice and may from time to time update the terms and conditions for using our Website, mobile apps or or services (including any update to this Privacy Notice). We will tell you when this Privacy Notice has been updated. Please note that any form on our Website, mobile apps and services that capture personal information is secured.
- 4.2 We do not knowingly collect data relating to children.

### 5. ***Cross TVB Group platforms single log in, social sharing and interactive features***

#### ***Single log-in Function and synchronization of updates***

- 5.1 There will be sharing of such items of your Identity and Contact information held in the Single Log-in Function of your BBCL user account /TVB member ID user account between us/BBCL, our parent company the Television Broadcasts Limited and such other TVB Company(ies) with [Single Log-in Function](#) and with whom you have set up an user account:.
- when you apply to register as a TVB member ID user for the first time when you subscribe for/access our Service you have already subscribed for) of services of TVB Companies with Single Log-in Function
  - when you download/activate/enable the mobile app(s) of the applicable company(ies) in the TVB Companies with Single Log-in Function to subscribe for services or access services that you have already subscribed for;
  - when you correct modify or update any of your Identity and Contact information held in your TVB member ID service user account; and/or
  - when you correct modify or update your Identity and Contact information held in your user account with Big Big Channel Limited, such other TVB Companies with Single Log-in Function

The sharing of your Identity and Contact Information will be to the extent as necessary to enable you to access the relevant online services offered by the applicable TVB Companies with Single Log-in Function (including Big Big Channel Limited and the Television Broadcasts Limited). Our parent company the Television Broadcasts Limited will be the party responsible for the management of the jointly used Identity and Contact information held in your TVB member ID service user account. In all other cases, we will obtain your express opt-in consent before we share your personal data with other TVB Group and/or any third party.

***Personal data held in the Single Log-in Function and TVB member ID user account***

- 5.2 As mentioned in [Section A, paragraph 2.2](#) above, our parent company/TVB will manage and process the items of Identity and Contact information held in the Single Log-in Function of your TVB member ID service user account as ‘controller’ as well as ‘processor’. We/BBCL and every other TVB Company(ies) with Single Log-in Function with whom you have set up a user account will also be controlling and managing such items of Identity and Contact information as ‘controller(s)’ respectively. Any updates you made to such items of your Identity and Contact Information (or you ask you to update for you) from time to time will be *synchronized and updated* across all of your user accounts you have set up with each relevant TVB Company(ies) with Single Log-in Function.

***Social sharing functionality and interactive features***

- 5.3 If you connect or log in our Service, the sharing of information between the Service and the relevant TVB Group company will be governed by this Privacy Notice.
- 5.4 If you connect or log in our Service via your third party social media account, we may use your personal information to facilitate your sharing of information between the Service and your social media account. **The use of the shared information by the service provider of your social media account will be governed by that provider’s privacy policy.** If you do not wish to share information this way, please DO NOT connect your social media account with the Service or your account with any TVB Group company.
- 5.5 Certain interactive or social media-like features available on or via the Service give you an opportunity to interact with us and others, for examples: chats, tagging, or providing comment on interest group forums. **You should note that any information you submit, such as your name user location email address profile image likes status comments and views that you may express, will become accessible to other users of the Service as well as being publicly available to anyone which includes any search engines and automated application. We are not responsible for any information you or other user choose to submit and make publicly available through these interactive features.** If you do not wish to share information this way, please DO NOT engage with the interactive features of the Service.

**6. *Collection of financial information by provider(s) of a Payment Service***

When you make a purchase from us (if applicable), you will be directed to a ‘payment service’ webpage operated by unaffiliated third party payment service provider (“**Payment Service**”) to facilitate the payment of any purchase you made with us. Any information that you may provide to a Payment Service will be governed by the relevant Payment Service provider’s privacy policy, rather than this Privacy Notice. We have no control over, and are not responsible for, any use of information collected through or by any Payment Service.

**7. *Change of purpose***

- 7.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.
- 7.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 7.3 Please note that we may process your personal data without your knowledge or consent in line with our data privacy approach set out in this Privacy Notice, where this is required or permitted by law.

## **E. Disclosures of Your Personal Data** [\[Top\]](#)

### ***TVB member ID service related***

- 1.1 Please see paragraphs [5.1 and 5.2 of Section D](#) (*How we use your personal data*) above for details of the sharing of your Identity and Contact information updates with other applicable companies within the TVB Group and any data synchronization linked to the of the TVB member ID credential/‘Single Log-in function’. Such sharing of your Identity and Contact information (as updated from time to time) will be to the extent as necessary to enable you to access the online services offered by us or log into your account with the applicable TVB Group companies.
- 1.2 We may have to share your personal data with the parties set out below for the purposes set out in the table in [Section D](#) (*How we use your personal data*) above:

#### (a) Internal Third Parties

- Other companies in the TVB Group acting as processors based in Hong Kong and in the EU who provide IT, system administration services and/or corporate support services. Big Big Channel Limited is the party responsible for the management of the personal data about you that we collect use and hold. As to the relevant items of your Identity and Contact information held in the Single Log-in Function, as previously mentioned in [Section D, paragraph 5.2](#) above, we and our parent company/Television Broadcasts Limited and each of the TVB Company(ies) with Single Log-in Function that you maintain an user account with will each be responsible for the management and the processing of such items of personal information about you as data ‘*controller*’ as well as data ‘*processor*’ respectively.
- To the extent as permitted by applicable law, we and companies within the TVB Group may also share your personal data with each other and with the TVB Group, for the purposes described in this Privacy Notice, including for each company's marketing purposes if you have consented to such use.
- Users who visit services of companies within the TVB Group should refer to their separate privacy notices which will govern the use of your information by the relevant TVB Group companies. The privacy notices of other TVB Group companies in certain respects may differ from this Privacy Notice.

#### (b) External Third Parties

- Service providers acting as processors based in Hong Kong, Asia, the United States or EU who provide IT and system administration services and/or corporate support services.
- Professional advisers acting as processors or joint controllers including lawyers,

bankers, auditors and insurers based in Hong Kong, Asia, the United States or the EU who provide consultancy, banking, legal, insurance and accounting services.

- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in Hong Kong, Asia, the United States or the EU who require reporting of processing activities in certain circumstances.
- Other third parties, for example, market researchers, fraud prevention agencies, market researchers price comparison sites, including:

Sharing technical Information with the following parties:

- (a) Analytics providers
  - i. Google Inc. based outside the EU;
  - ii. NicePeopleAtWork based inside the EU
  - iii. AC Nielsen based outside the EU
  - iv. Facebook based outside the EU;
  - v. Emarsys based outside the EU;
  - vi. Google Ad Remarketing based outside the EU.
- (b) Advertising networks
  - i. DoubleClick based outside the EU
  - ii. Google Analytics

Sharing contact, Financial and Transaction Information with providers of technical, payment and delivery services

- i. Apple Inc. based outside the EU
- ii. Google Inc. based outside the EU
- iii. AsiaPay Limited based outside the EU
- iv. mPay Limited based outside the EU
- v. Alipay based outside the EU
- vi. Union Pay based outside the EU
- vii. WeChat Pay based outside the EU

Cloud system

- (a) Google Inc. based outside the EU

- 1.3 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### ***Co-Branded Services***

- 1.4 We may work with external unaffiliated third party in offering co-branded services or features, such as contests, activities, events or other promotions ("**Co-Branded Services**"). We may hold such Co-Branded Services or that such services may be hosted on the relevant third party's service. If you have consented to such use we may share information you submit in connection with the Co-Branded Service with the relevant third party. The third party's use of your personal information will be governed by the relevant third party's privacy notice.

## **F. International Transfers** [\[Top\]](#)

- 1.1 Big Big Channel Limited (a company incorporated in Hong Kong) is the data controller responsible for the Website, the Service and for the personal information we collect and hold about you. We share your personal data within the TVB Group and other external third parties:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to perform a contract we have entered into with another person to facilitate service provision to you.

Many of our external third parties are based outside the EU or European Economic Area (**EEA**), so their processing of your personal data will involve a transfer of data outside the EU or the EEA. As such, these activities will involve transferring your data outside of the EU or the EEA.

1.2 In other instances, when we transfer your personal data out of the EU or EEA, we seek to ensure at least one of the following safeguards is implemented to protect your personal data:-

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield (or other arrangement as approved by the European Union) which requires them to provide similar protection to personal data shared between the Europe and the US.

## **G. Data Security** [\[Top\]](#)

1.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

1.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

1.3 We have internal policies on data protection and information security which define our commitments and responsibilities to your privacy. We provide regular training to staff that handle personal data to safeguard against any misuse and to help ensure your personal information is looked after properly. We will not keep your information longer than it is needed or where the law states how long this should be kept. We will dispose of paper records or delete any electronic personal information in a secure way.

## **H. Data Retention** [\[Top\]](#)

### ***1. How long we retain your personal data***

1.1 We will only retain your personal data for as long as reasonably necessary as the law permits to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

### *The factors we take into account in determining period of data retention*

- 1.2 To determine the appropriate retention period for personal data, we consider:
  - the amount, nature, and sensitivity of the personal data;
  - the potential risk of harm from unauthorized use or disclosure of your personal data;
  - the purposes for which we process your personal data;
  - whether we can achieve those purposes through other means; and
  - the applicable legal requirements.
- 1.3 By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for a requisite period after they cease being customers to comply with legal requirements (such as for accounting or tax purposes).
- 1.4 In some circumstances you can ask us to delete your data by sending email to us at [data.protection@bigbigchannel.com.hk](mailto:data.protection@bigbigchannel.com.hk). Please see paragraph 1.2 (c) in *Section I* (Your Legal Rights) below.
- 1.5 In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **I. Your Legal Rights** [\[Top\]](#)

- 1.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights. Where possible we will seek to comply with your request but we may be required to hold or process information to comply with a legal requirement. All request will be considered without delay and within ONE month of receipt as far as possible. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.
- 1.2 You have the right to:
  - (a) **Request access** to your personal data (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
  - (b) **Request correction** of your personal data. We aim to ensure that the personal information we hold about you is accurate and up to date. There may be situations where you find the information we hold is no longer accurate and you have the right to have this corrected. You can log on our Website to update your personal information, or by [contacting us](#) though we may have to verify the accuracy of the new data you provide to us.
  - (c) **Request erasure** of your personal data. You have the right to have your personal data delete or remove personal data where there is no good reason for us to continue to process it where:
    - the data is no longer necessary in relation to the purpose for which the data was collected;
    - where you have successfully exercised your right to object to processing (see below, i.e. sub-paragraph 1.2(d));
    - where there is no legal basis for further processing; or
    - there is a legal obligation to delete the data to comply with local law.

However this will not affect the lawfulness of any processing carried out before your erasure request and that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you if applicable at the time of your request. We may not be able to provide certain products or services to you as a result and we will advise you if this is the case at the time upon your erasure request.

- (d) **Object to processing** of your personal data. You have the right to ask us to stop using your personal data, however this may cause delays or prevent us in delivering products or services to you pursuant to your request for Service or under the existing contract you have with us. You have the right to object to processing where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (e) **Request restriction of processing** your personal data. You have the right to ask for processing of certain aspects of your personal information that we hold to be suspended or restricted in the following scenarios:

- if the accuracy of the personal data is being contested, or
- where our processing is unlawful but you do not want it erased, or
- if the personal data is no longer needed for the purpose of the processing but you need us to hold the data as it is required by you to establish, exercise or defend legal claims, or
- if you have objected to the processing, pending verification of that objection

However, this will not affect the lawfulness of any processing carried out before your request and that we may not be able to provide certain products or services to you pursuant to your request for Service or under the existing contract you have with us. We will advise you if this is the case at the time of your request to restrict or suspend the processing of certain aspects of your personal data.

- (f) **Request transfer of your personal data** to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) **Right to withdraw consent** where we are relying on consent to process your personal data. However this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

1.3 Where possible we will seek to comply with your request but we may be required to hold or process information to comply with a legal requirement.

1.4 If you are unhappy with the way we use your personal data, you also have the right to complain to the relevant supervisory authority for the purpose of the Data Privacy Law within the EU. We would, however, appreciate the chance to deal with your concerns by [contacting us](#) before you approach the supervisory authority so please contact us in the first instance.

## 2. *Our Contact details*

If you wish to exercise any of the rights set out above, please *contact us by emailing* our **Data Protection Team** at [data.protection@bigbigchannel.com.hk](mailto:data.protection@bigbigchannel.com.hk), specifying what category of information is being sought:

**For the attention of: Data Protection Team, Big Big Channel**

Email Address: [data.protection@bigbigchannel.com.hk](mailto:data.protection@bigbigchannel.com.hk)

Postal Address: Level 4 & 5, Production Centre of Shaw Studio,  
201 Wan Po Road,  
Tseung Kwan O, Kowloon,  
Hong Kong

## 3. *No fee is usually required*

You will not have to pay a fee to access your personal data (or to exercise any of the other rights set out in [paragraph 1.2 of this Section I](#) above). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## 4. *What we may need from you*

We may ask you to give us specific information to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## 5. *Time limit to respond*

We try to respond to all legitimate requests within ONE month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## J. **General** [\[Top\]](#)

This Privacy Notice is written in English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this Privacy Notice, the English version shall prevail.

## K. **Glossary** [\[Top\]](#)

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to enhance our services/products and improve your experience in using and accessing our services/products. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless



we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal and/or regulatory obligation that we are subject to.

*This Privacy Notice is last update on 06-Apr-2020*

Version:2.0