

## Appendix C – Data Protection and Privacy Policy

In this Policy, “we” or the “Academy” refers to the Orion Astropreneur Space Academy, and “Ordinance” refers to the Personal Data (Privacy) Ordinance, Chapter 486 of the laws of Hong Kong.

### Member’s Privacy

We are committed to respecting and protecting the privacy of those making applications or requests to participate (“Participants” or “you”) in our activities (“Activities”) by observing and ensuring full compliance with the requirements stipulated under the Ordinance. We are equally committed to ensuring that all our internal processes uphold these obligations. We recognize that when you choose to provide us with information about yourself, you trust us to act in a responsible manner. That’s why we have put a policy in place to protect your personal data. Please read on for more details on how we handle your personal data.

#### What does the Academy collect and how do we use the data collected?

If personal data is collected in the process of making enquiries or submitting applications or requests to participate in our activities, participants will be informed via the respective Personal Information Collection Statements of such purposes and uses, including the extent of their transfer and disclosure; and the right of access to and correction of the collected personal data.

#### Will the Academy disclose or transfer the data it collects to outside parties?

The Academy will NOT disclose or transfer personal data collected to outside parties unless such disclosure or transfer is authorised, required or permitted by, or in compliance with, the Ordinance. Please refer to the relevant Personal Information Collection Statement for details.

### Data Security

We are required by the Ordinance to take all reasonably practicable steps to safeguard the security of personal data held by us. The Academy will strive to protect any personal data held by us against unauthorized access or processing.

Notwithstanding our obligation to safeguard the security of personal data, we are unable to guarantee complete security of electronic communications through the internet given the open nature of the internet. You will have to assess and accept the relevant risks before sending personal data to us via email or any form of electronic communications.

### Accuracy and Retention of Personal Data

We are required by the Ordinance to take all reasonable practicable steps to ensure that personal data held by us (i) is accurate having regard to the purposes for which the data is to be used; and (ii) is not kept longer than is necessary for the fulfilment of the

purpose for which the data is to be used unless otherwise permitted by the Ordinance or required by any applicable legal or regulatory requirements. Please note that personal data collected from a Participant who has opted to receive direct marketing materials will be retained for that purpose until he or she notifies us otherwise.

#### [Direct Marketing of the Academy's Activities and Publications](#)

Subject to the applicable requirements under the Ordinance, we may from time to time send direct marketing materials promoting Activities, publications, services, products or facilities to you using your personal data. Please refer to the relevant Personal Information Collection Statement for details. Opt-out channel or facilities will be provided to enable you to exercise your right to opt out from direct marketing.

We will not provide your personal data to third parties for direct marketing or other unrelated purposes without your consent.

Despite your provision of consent to use your personal data for direct marketing, you may at any time notify your intention to withdraw such consent.

#### [Access to Personal Data and Correction Requests](#)

You have a right under the Ordinance to request access to and/or correction of your personal data held by us. Please refer to the relevant Personal Information Collection Statement on how to make data access requests or data correction requests.

#### [Questions?](#)

Our goal is to respect your privacy. To help us improve our privacy policies, please give us your feedback. We welcome your comments and questions. Should you have any queries or comments about our privacy policy and practice, please e-mail the Chief Compliance Officer of at the Academy ([vcdata@oasahk.org](mailto:vcdata@oasahk.org)).