

The Henderson Platform Privacy Policy Statement and Personal Information Collection Statement

1. Your Personal Data Privacy

The Henderson mobile application ("App") and tenant portal ("Tenant Portal") (together known as "The Henderson Platform", or the "Platform") is an integrated services application platform for The Henderson building in Hong Kong managed and operated by Henderson Leasing Agency Limited ("Henderson Leasing Agency", "We" or "Us"), a subsidiary of Henderson Land Group Development Company Limited. We respect your legal rights of privacy when collecting, storing, using, and transferring personal data and this Privacy Policy Statement (the "Statement") explains our privacy practices. It is our policy to comply with the requirements of the Personal Data (Privacy) Ordinance (Cap. 486) (the "Ordinance") of the Laws of the Hong Kong Special Administrative Region of the People's Republic of China ("Hong Kong"). For the purpose of this Statement, personal data has the same meanings as defined in the Ordinance.

We collect personal data only for operating, maintaining The Henderson Platform and other related purposes, and we shall take reasonable and practicable steps to protect your personal data and prevent unauthorized or accidental access, deletion, or other use. However, given the open nature of the internet, we cannot guarantee that risks can be completely eliminated.

Please read the following carefully to understand our policy and practices regarding how your personal data will be treated. This Statement applies to personal data collected through The Henderson Platform. We have the right to modify and update this Statement as may be necessary from time to time without notice to you but we shall post the updated Statement on the mobile application, so please review it regularly. If you have registered for The Henderson Platform, you are deemed to have read, understood and agreed to accept this Statement and the Personal Information Collection Statement every time you login to The Henderson Platform.

If there is any inconsistency or ambiguity between the English version and the Chinese version, the English version shall prevail.

2. Collection of Data and Use

We shall collect your personal data as reasonably necessary, including but not limited to your name, contact information namely company email address and mobile number, gender, birthday month, Log Files (as defined hereinafter), Tracking Information (as defined hereinafter) about your use of the application and transaction information (including the characteristics and transaction behavior) so as to provide you with information on events, promotions, products

and/or services. You are not obliged to supply us with your personal data, but if you do not, we may not be able to provide you with our products and/or services.

We shall use your personal data primarily for membership registration under The Henderson Platform and subsequent Platform related purposes including integrated building services, provision of promotional offers, products, services, facilities and information; arranging and hosting events; management and operations of The Henderson Platform. Please also refer to the Personal Information Collection Statement below for details.

3. Disclosure and transfer of Personal Data

We shall take all practicable steps to ensure the security of your personal data. For the purposes of The Henderson Platform's operation and related functions and arrangements, we may disclose or transfer your personal data to the third parties, details of which are set out in Section B of the Personal Information Collection Statement below.

4. Links to Other Websites

The Henderson Platform may use or involve third parties for the provision of content, services, and products and the Platform may provide hyperlinks connecting to other third parties' applications or websites. This Statement only applies to The Henderson App and Tenant Portal. If you click on any hyperlink linking to the third party's application(s) or website(s), you will leave The Henderson App or Tenant Portal and enter into the third party's application(s) or website(s). This Statement is not applicable to the mobile applications or websites owned by the third parties. We are not responsible for the collection and protection of personal data by the third parties' applications or websites; and you are advised to read the privacy policy of the third parties' application or websites to understand the arrangements.

5. Cookies and Tracking Information

We use cookies and other tracking mechanisms to track information about your use of The Henderson Platform ("Tracking Information") to improve The Henderson Platform's performance and to enhance the users' online experience. Session cookies are used to enable users to browse and use the basic functions on the Platform, such as maintaining login details for the session so that the need to transfer information across the internet may be reduced. We shall not collect any personal data from users when the cookies are being used. However, we may combine the Tracking Information with other personal data we collect from you to better understand and serve you, and in such case, the Tracking Information shall be considered as personal data and

we will use and treat it in accordance with this Statement and the Personal Information Collection Statement.

6. Log Files

When you use The Henderson Platform, we will collect only data relating to your use of the Platform, including but not limited to your IP address, interest preference, transaction information, mobile carrier and access time (collectively "Log Files"). The Log Files do not contain any personal data and we shall not collect your personal data when the Log Files are being used. However, we may combine the Log Files with other personal data we collect from you to better understand and serve you, and in such case, the Log Files shall be considered as personal data and we will use and treat it in accordance with this Statement and the Personal Information Collection Statement.

7. Security

We shall take all practicable measures to ensure the security of personal data. Your personal data, irrespective of how it is stored, will only be accessed or processed by our employees, agents, contractors and/or third-party service providers who are authorised to do so and under a duty of confidentiality to us. Such authorised personnel or contractors designated to handle personal data must follow our instructions.

8. Your Right of Access to and Correction of Your Personal Data

In accordance with the provisions of the Ordinance, you have the right to request access to and to correct personal data relating to you in our records at any time. If you need to exercise your rights, you may contact us at the address stated in section 9 below and mark your communication "Confidential". While processing your request, we may request you to provide certain personal information about yourself, so as to verify your identity. We shall respond within the time specified in the Ordinance. We may charge you a fee not more than necessary for processing your request of access to information.

9. Personal Data Privacy Officer

The person to whom one (1) requests (a) for access to data or correction of data; (b) for general information regarding our policies and practices with respect to personal data; and (c) about the kinds of personal data that we hold, or (2) make general enquiries and complaints should be addressed as follows: -

Personal Data Privacy Officer (Portfolio Leasing Department)
Henderson Leasing Agency Limited (Marked Confidential)
Address: 73/F, Two International Finance Centre, 8 Finance Street, Central, Hong Kong

10. Retention of Data

We shall take all reasonably practicable steps to ensure that we do not retain your personal data beyond the time required to complete the purpose for which the data was collected, except where the continued retention of personal data is required or permitted by the Ordinance.

All personal data will be removed from our database 90 days from the date of our issuance of the Cancellation Confirmation (as defined in the terms and conditions of The Henderson Platform) except where our continued retention of your personal data is required by the Ordinance.

PERSONAL INFORMATION COLLECTION STATEMENT

This Personal Information Collection Statement is applicable to The Henderson Platform which is managed and operated by Henderson Leasing Agency Limited ("Henderson Leasing Agency", "We" or "us").

We are committed to complying with the requirements of the Personal Data (Privacy) Ordinance (Cap. 486) (the "Ordinance") of the Laws of the Hong Kong Special Administrative Region of the People's Republic of China ("Hong Kong") in relation to the collection, storage, use and transfer of personal data.

We may collect your personal data as reasonably necessary, including your name, contact information namely company email address and mobile number, gender, birthday month, Log Files, Tracking Information about your use of the Platform and transaction information (including the characteristics and transaction behavior) so as to provide you with information on events, promotions, products and/or services offered by The Henderson Platform. You are not obliged to supply us with such personal data, but if you do not supply us the information marked with (*) that must be completed, we may not be able to provide you with our products and/or services.

FOR THE PURPOSES OF THIS STATEMENT:

"Henderson Land Group" or "Members of Henderson Land Group" refers to Henderson Land Group Development Company Limited and its subsidiaries including without limitation Henderson Real Estate Agency Limited, Henderson Leasing Agency Limited and its associated companies, and any other related entities managed by Henderson Land Group Development

Company Limited or its subsidiaries or associated companies from time to time. An entity is considered to be managed by another entity in the following circumstances:

- i. This other entity may direct the affairs, or manage the composition of its board of directors, or its governing bodies; or
- ii. This other entity holds not less than 20% of its issued shares, or owns an interest in its shares, which entitles this entity the right or control to exercise not less than 20% of the voting rights at its general meeting of shareholders.

"Group Partners" refers to (i) a person who cooperates with or assists us in providing products and services offered by The Henderson Platform, (ii) any joint venture company established by a member of Henderson Land Group together with any other property developer or other persons, to provide products, services or facilities related to real estate properties, or (iii) a person who appoints us to promote, sell or lease real estate property for him/her.

A Purpose of collection and use of Personal Data

We may use your personal data for one or more of the following purposes: -

- i. Providing, marketing and promoting services, products, and/or facilities of properties managed or owned by Henderson Land Group as well as managing, maintaining, processing, operating, improving and introducing these services, products and/or facilities (please refer to Section C "Use and Provision of Personal Data for Direct Marketing" below);
- ii. Delivering information to users of the mobile application ("user" or "users") that the users may have interest in, such as banners of targeted promotional events, new products and services and other promotions and marketing materials of properties managed under Henderson Land Group (please refer to Section C "Use and Provision of Personal Data for Direct Marketing" below);
- iii. For payment purposes for any services, products and/or facilities, including the verification of credit card details with third parties
- iv. For identification and verification purposes in connection with any of the services, products and/or facilities that may be supplied to you through The Henderson Platform;
- v. For reservations with or through us and/or any of our services, products and/or facilities
- vi. Monitoring use of the The Henderson Platform to help facilitate the development of the The Henderson Platform;

- vii. Designing new and/or enhancing existing services, products, facilities, activities, contests, promotions and/or other events relating to Henderson Land Group's portfolios of properties or tenants in such portfolio of properties ("Merchant(s)")
- viii. Managing customer relationship and relationship with Henderson Land Group's Merchants;
- ix. Conducting research and analysis, including market research by The Henderson Platform and Members of the Henderson Land Group, from time to time to better understand your consumption needs, preferences, interests, experiences and/or habits;
- x. Compiling aggregate statistics about our users to analyze The Henderson Platform usage;
- xi. Operating internal control, following up on comments and enquiries, investigations and handling complaints and disputes, and enforcing terms of use and related legal matters in relation to The Henderson Platform;
- xii. Processing users' registration, setting up and maintaining users' accounts of The Henderson Platform;
- xiii. Contacting and communicating with users in respect of matters and arrangement related to the use of The Henderson Platform and/or the use of services provided by The Henderson Platform;
- xiv. Processing, following up and evaluating the provisions by The Henderson Platform of services, privileges, rewards, promotions, discounts, special offers or conveniences, or applications, requests, registration and reservation of products, services and/or facilities offered by Henderson Land Group's Merchants;
- xv. Checking and comparing any information relating to you from time to time for the purposes listed in this section;
- xvi. Preventing or detecting any illegal or suspicious activity;
- xvii. Complying with any law binding on us or for the purposes of any guidelines or codes of practice issued by regulatory or other authorities with which we are reasonably expected to comply; and
- xviii. Any other purpose(s) relating to the above, or any other purpose which has been agreed by the user from time to time.

B Disclosure and Transfer of Personal Data

To facilitate the above purposes, we may disclose or transfer the user's personal data to any of the following parties irrespective of whether such parties are located inside or outside Hong Kong, provided that any disclosure or transfer of the user's personal data to another person for direct marketing purposes is subject to the "Use and Provision of Personal Data for Direct Marketing" in the next section :

- i. Members and associates of the Henderson Land Group;
- ii. Any agents, contractors and/or third-party service providers providing us with services in relation to administrative, telecommunications, information technology, system management, repair and maintenance and/or other services to support the business operation of us or Henderson Land Group;
- iii. Any person who has a duty of confidentiality to us, including our accountants, legal advisers or other professional advisers; and
- iv. Any regulatory or other authorities to whom we are required to make disclosure under any law binding on us or upon any request, guidelines or codes we are reasonably expected to comply with.

C Use and Provision of Personal Data for Direct Marketing

We intend to use the personal data of users (mainly the name, contact information, customer profiling information (including information about your use of our mobile application, including your preferences and online behavior), services and products portfolio information, and transaction pattern and behavior collected, compiled, generated or held by us) for direct marketing purposes and provide such personal data to the parties referred to in section B(i) above. To use the personal data of users for direct marketing purposes or disclose or transfer users' personal data to other persons for direct marketing purposes, we must obtain written consent from the users.

In terms of direct marketing, we intend to:

- a. Use and analyze the personal data collected, formulated, compiled or held by us from time to time, in order to understand the needs, preferences and usage patterns and habits relating to our products, services and facilities;
- b. Promote the following categories of products, services, and matters to the user:
 - i. Real properties inside and outside Hong Kong, including residential, office, and commercial properties and industrial buildings, shops, hotels and serviced apartments, shopping malls, car parks and parking spaces;
 - ii. Catering and travelling, shopping malls, department stores and related activities and matters;
 - iii. Consumer goods and services, including homeware, household services, cooking supplies, kitchen utensils, electrical appliances and furniture, entertainment, electronic products, computers and accessories, audio and video products, stationery and toys,

baby goods, apparel, fashion, accessories, leather goods, luggage, footwear, watches and jewellery, healthcare products, hair products, beauty products and cosmetics, leisure goods, pet products and services, environmental protection and health products;

iv. Electronic services including online transaction or payment platforms or electronic payment services;

v. Property management, construction, gas stoves and appliances and applications;

vi. Insurance, credit financing, finance and financial services;

vii. Telecommunications and information technology;

viii. Transport infrastructure operations and management, transportation and logistics;

ix. Rewards / incentives / promotions, corporate social responsibility activities, charitable and non-profit making related matters.

c. The above products, services and objects may be provided by us or any parties referred to in section B(i) above;

d. We provide the personal data of user to other persons referred to in section B(i) for marketing purposes for a return on money or other assets.

If the user agrees to allow us to collect, use, process or transfer his /her personal data for direct marketing purposes in accordance with the Privacy Policy Statement and this Personal Information Collection Statement, please put a tick in the box provided.

Users may decide whether or not to accept direct marketing at their own discretion and have the right to change their choice at any time in the App settings page inside the App. If users would like to change their choice and are not able to do so in the App, please write to the address listed in the "Access to and Correction of Personal Data" section below. If we receive the user's notification to refuse direct marketing, we shall process it in due course without charge so that the user will not be included in subsequent direct marketing.

We may send promotional information about products and services to users from time to time according to users' choice of direct marketing. During the marketing process, we shall provide an appropriate option of "refusal of direct marketing". If users do not want to receive promotional news for The Henderson tenant users and/or information about the group and/or its subsidiaries, associated and/or related companies and/or third-party service providers, please send an email to thehendersonapp@hld.com or notify us in writing (please refer to the next section for our address).

D Access to and Correction of Personal Data

In accordance with the Ordinance, the user has the right to:

- i. Inquire whether we hold the user's personal data in our records, and have access to personal data relating to the user;
- ii. Correct any inaccurate information of the user's personal data; and
- iii. Be informed of our policies and practices regarding personal data

Users requiring access to or correction of personal data or making other enquiries are requested to write to the address below and mark your communication "Confidential". While processing a user's request or inquiry, we may request the user to provide certain personal information, so as to verify the user's identity. We shall respond within the time as specified in the Ordinance. We may charge a not more than necessary fee for processing access to information.

Personal Data Privacy Officer (Portfolio Leasing Department)

Henderson Leasing Agency Limited (Marked Confidential)

Address: 73/F, Two International Finance Centre, 8 Finance Street, Central, Hong Kong