

# KPMG's Executive Search and Recruitment Practice

## Personal Information Collection Statement

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KPMG's Executive Search and Recruitment Practice (KPMG Executive Recruitment Limited) and the other member firms of KPMG International are dedicated to the protection of your Personal Data, which is shared through the use of our Services and websites ('the Site'). The purpose of this Personal Information Collection Statement (PICS) is to explain our methods for the collection, use and disclosure of Personal Data, both offline and through our Site. Our priority is to ensure that such information remains private, in accordance with the PICS and complies with the Personal Data (Privacy) Ordinance (PDPO) in Hong Kong. By providing Personal Data to us, you consent to the collection, use and disclosure of such information by us in accordance with the PICS and PDPO.

For the purpose of the PICS, other member firms of KPMG International are not deemed to be a Third Party to our Services Contract.

### I. Collection of your Personal Data

We collect your Personal Data, for instance your name, contact details, education, qualifications, employment history, references, right to work in Hong Kong or China, languages spoken, passport numbers, identity card numbers, proof of income and qualification, professional memberships and accreditations, career interests and expectations as well as any other information included in your curriculum vitae which you choose to give us and correspondence. Aside from certain cases where we would request sensitive information, you are not advised to communicate such data, as it would be retained.

We may also collect Personal Data concerning you from publicly accessible sources, such as social media sites.

Fair process is the overarching principle governing the collection, storage and use of Personal Data. All collected Personal Data is used and/or disclosed strictly for the purposes referred to in the following paragraphs.

### II. Use of your Personal Data

We use your Personal Data, in ways which are listed below:

- (i) **Recruitment and employment purposes:** We mainly use your Personal Data for any purpose which is related to your recruitment and employment, such as the numerous administrative tasks which surround interviewing, evaluating and employment. We use your Personal Data to identify professional opportunities and we choose to contact you

regularly on that matter. Third Parties may also be contacted to obtain Personal Data regarding you.

- (ii) **Business purposes:** Personal Data may be used for matters such as maintaining business relationships with candidates or Clients, data analysis, administering and improving Services, enhancing our website, internal communication regarding candidates and Clients, identifying usage trends, audits, evaluating the effectiveness of promotional activities, etc.
- (iii) **Meet Clients' requests:** Personal Data may be used to respond to such inquiries. If you take the initiative of contacting us, record may be kept of contact information and any information contained in the correspondence.
- (iv) **Informational communications:** We may occasionally send you informational engagement letters, e-mails, proposals, articles, white papers, and other information regarding the Services. E-mail or postal addresses may also be used to conduct surveys. Where Personal Data is processed for the purposes of direct marketing, procedures exist allowing you to "opt-out" from having your Personal Data used for such purposes.
- (v) **Compliance purposes:** Personal Data may be used (a) for the purposes of internal risk assessments; and (b) for supporting the maintenance of quality and professional standards in the delivery of service (e.g. through the involvement of professional practice and policy departments, the participation in quality assurance measures or the establishment and maintenance of knowledge databases).
- (vi) **Administrative information:** Your contact information may be used occasionally to send important information regarding the Site, modifications of terms and conditions, changes in the policies or other related matters. We may also contact you to ensure that the Personal Data in our possession is correct and up to date. Indeed, we review Personal Data in our possession regularly and delete it when it is no longer required, bearing in mind that there are some professional and legal obligations to retain such Personal Data for prescribed time periods.
- (vii) **De-identified data:** Personal Data may be condensed and anonymised in such a way that the resulting product does not personally identify you or any other individual. After this process, such information is no longer considered Personal Data in the eyes of the PDPO. Therefore, it may be used for any purpose, such as compiling reports, developing new norms, publishing articles or newsletters, or conducting ongoing validation studies.

Personal Data is to be used for the purposes stated above. We may use your Personal Data for other purposes only where you have expressed beforehand an appropriate approval. Any unauthorised use of such information, in breach of the PICS, may be followed by disciplinary action for the concerned personnel.

### III. Disclosure of your Personal Data

Disclosure of Personal Data by us, though rare, may occur for the reasons stated below:

- (i) **Disclosure in the course of an investigation:** Law enforcement bodies, courts or regulators may require us to release your Personal Data.
- (ii) **Disclosure to third party service providers:** We may occasionally disclose Personal Data to

other affiliates or subsidiaries or to independent service providers (whether within or outside Hong Kong), which may only use it for the purposes stated above.

- (iii) **Disclosure of Sensitive Information:** We may not disclose sensitive information to a third party (if supplied), which was not originally intended to benefit from it, without your consent.

## IV. Privacy on our Site

We also gather Other Information – through procedures differing from those described above – which does not reveal your specific identity. Consequently, we may use such information for any purposes. Other Information covers:

- (i) **De-identified data about visitors of our Site:** Information gathered here will solely be used for compiling aggregate statistics, for example to determine our most frequently used online services. This is done in order to manage and improve the design of the Site. The anonymity of users is ensured at all times.
- (ii) **Cookies:** We store and track information about you by means of cookies to improve your personal experience of the Site. It may include your login details, the tracking of your personal use of the Site or the temporary storage of your last search for example. These cookies are only read by our servers and are unable to execute any code or virus. You have the possibility of ‘opting out’ from the application, however please bear in mind that this action will restrict your use of our Site.

## V. Access to your Personal Data

You have a right to request access to, to request correction of and to delete your Personal Information from our database. For the deletion of your Personal Data from our database, we may not be required or able to do so, especially where your file contains information from other parties .

Residual information in our database will not be used for any commercial purposes. However, we reserve the right to recontact former Clients of our Services.

For any questions regarding these matters, please refer to our Privacy Liaison at the address set out in Section VII below. You may be subjected to an identity check and asked for some complimentary information where we deem it necessary. Furthermore, we may be legally permitted to prevent access to your Personal Data, in which case we shall give sufficient justifications for such course of action. A reasonable administrative charge may be charged for complying with your requests, to the extent permitted by the PDPO.

## VI. Security

We have taken all reasonable steps to ensure your Personal Data is protected from any loss, misappropriation or modification. These precautions include technical, physical and organisational security measures, which are adapted depending on the sensitivity of the information and the level of risk associated with the processing of the Personal Data. Where a Third Party processes Personal

Data on our behalf, it will be ensured that the Third Party is under an obligation:

- (i) Not to process or transfer the Personal Data except pursuant to instructions from us; and
- (ii) To take appropriate measures to protect the Personal Data to an extent substantially similar to the protections provided by us.

Nevertheless, no security system protecting the transit of information over the Internet is 100% reliable. Consequently, if you become aware that the privacy of our communications has been compromised, you must bring this problem to our immediate attention by contacting our Privacy Liaison at the address in Section VII below.

## VII. Changes to the PICS

We review our internal practices periodically; the PICS may therefore be subject to certain modifications in the future. You are advised to regularly consult the Site, in order to be sure to have the latest version of the PICS. Any update to the PICS becomes effective upon posting on the Site, and your use of the Site following this event constitutes an acceptance of the revision.

## VIII. Contact

Any questions regarding the PICS should be directed to our Privacy Liaison, whom you can contact:

- (i) By email at [cn-fmdataprivacy@kpmg.com](mailto:cn-fmdataprivacy@kpmg.com); or
- (ii) By mail at **KPMG Hong Kong, Privacy Officer, 8/F Prince's Building, Chater Road, Central.**