

OCTOPUS APPLICATIONS LIMITED

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GENERAL

1. This Privacy Policy Statement applies to the collection, holding, use, processing, transfer and disclosure of personal data by Octopus Applications Limited ("OAL", "we", "our" or "us") in connection with the registration for, use of and participation in the Octopus Dood Rewards Platform and related Programmes. For the avoidance of doubt, Octopus Cards Limited ("OCL") remains responsible for Octopus, Octopus Wallet, OCL products and services, OCL direct marketing activities and related personal data handling under OCL's applicable personal information collection statement and privacy policy statement.

OUR COMPANY POLICY

2. We pledge to meet fully, and where possible exceed, internationally recognised standards of personal data privacy protection in complying with the requirements of the Ordinance. In doing so, we promise to:
 - (i) collect adequate, but not excessive, Personal Data by lawful and fair means for lawful purposes directly related to our functions and activities;

- (ii) take all reasonably practicable steps to ensure that all Personal
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Data collected or retained are accurate, having regard to the purposes for which they are to be used;

- (iii) ensure that Personal Data are not used where there are reasonable grounds for believing that they are inaccurate, having regard to the purposes for which they are to be used;
- (iv) erase Personal Data which are no longer necessary for the fulfillment of the purposes for which they are to be used;
- (v) use Personal Data only for purposes for which the data were to be used at the time of the collection of the data, unless you have given your express consent for a change of use or such use is required or permitted by the Ordinance or the law of Hong Kong Special Administrative Region ("Hong Kong");
- (vi) take all reasonably practicable steps to ensure that Personal Data are protected against unauthorized or accidental access, processing, erasure or other use;
- (vii) take all practicable steps to ensure that you can be informed of the kinds of personal data we hold and the main purposes for which the data are to be used; and
- (viii) allow you to access and request correction of your Personal Data held by us in a manner prescribed by the Ordinance. We may charge you a fee as permitted by the Ordinance in complying with your data access request.

STATEMENT OF PRACTICES

TYPES OF PERSONAL DATA COLLECTED AND HELD

3. For the purpose of providing, operating, administering and supporting the Octopus Dood Rewards Platform and related Programmes, we may collect and hold the following personal data to enable us to provide the related service to you:
 - a. mobile phone number;
 - b. email address;
 - c. Octopus Wallet number;
 - d. Eligible Octopus number;
 - e. Octopus Rewards Platform Account information;
 - f. Programme participation records;
 - g. transaction-related reward records;
 - h. reward status;
 - i. redemption history; and

- j. account activity, usage and system interaction data relating to the Octopus Dood Rewards Platform.

PURPOSES OF KEEPING PERSONAL DATA

4. Personal Data held by us may be used for the following purposes (as the case may be):
 - (a) processing and administering your registration for the Octopus Rewards Platform Account;
 - (b) providing, maintaining, operating, administering and supporting the Octopus Dood Rewards Platform and the Programmes;
 - (c) verifying your eligibility, account status, Required Information, Eligible Octopus, Octopus Wallet and reward entitlement;
 - (d) crediting, reversing, forfeiting, redeeming, reconciling and maintaining records of Rewards;
 - (e) handling enquiries, requests, complaints, disputes, suspected misuse, suspicious activities and system or operational issues;
 - (f) maintaining the security, integrity and proper functioning of the Octopus Dood Rewards Platform;
 - (g) conducting data matching, verification, reconciliation, testing, system integration, audit, risk management and service improvement activities in connection with the Octopus Dood Rewards Platform;
 - (h) complying with applicable laws, rules, regulations, codes, guidelines, court orders, law enforcement requests, regulatory requirements or other legal or regulatory obligations; and
 - (i) any other purpose directly related to the above.

USE OF PERSONAL DATA IN DIRECT MARKETING

5. OAL does not use or provide your personal data for direct marketing in connection with the Octopus Dood Rewards Platform unless permitted under applicable laws and with any required consent or indication of no objection from you.
6. Any direct marketing by OCL, including personalised offers, promotions or benefits relating to OCL products and services and/or your Octopus Rewards Platform Account, is administered by OCL separately in accordance with OCL's applicable personal information collection statement, privacy policy statement and direct marketing consent arrangements.
7. Nothing in this Privacy Policy Statement, the Octopus Dood Rewards Platform registration process or your participation in any Programme shall, by itself, constitute your consent or indication of no objection to the use or provision of your personal data for direct marketing by OAL, OCL, any Programme Organiser, Merchant, affiliate or other third party.

8. For direct marketing by OCL, you may update your direct marketing preference under the "Direct Marketing" setting in the Octopus Mobile App or through such other means as announced by OCL from time to time, in which case OCL will cease to use your personal data for such direct marketing at no cost to you.
9. We may send you operational or service-related communications in connection with your Octopus Rewards Platform Account, the Octopus Dood Rewards Platform and the Programmes, including notifications about your registration, participation, reward status, Programme changes, redemption reminders, customer support matters and service notices. Such communications are operational in nature and do not constitute direct marketing.

DISCLOSURE OF PERSONAL DATA

10. All Personal Data will be kept confidential by us but in accordance with the Conditions, we may, for the purpose(s) set out above, transfer or disclose such Personal Data to the following parties:
 - a. OAL's agents, contractors, professional advisers, service providers, system operators, telecommunications providers, cloud or hosting providers, data processing service providers, customer service providers, redemption or fulfilment service providers, audit, risk management and compliance support providers, and other persons who provide administrative, technology, operational or support services to OAL in connection with the Octopus Dood Rewards Platform;
 - b. OCL and its agents, contractors and service providers, where relevant to the operation, administration, maintenance, support, verification, system integration and reconciliation of the Octopus Dood Rewards Platform, Octopus, Octopus Wallet or related OCL systems or services;
 - c. the relevant Programme Organiser or Merchant, only where reasonably necessary for administering the relevant Programme, handling your enquiry, request or complaint, verifying reward entitlement, redemption or fulfilment, or where you have otherwise consented;
 - d. OAL's subsidiaries and affiliates, where relevant to the purposes set out in this Privacy Policy Statement and subject to appropriate confidentiality obligations; and
 - e. law enforcement agencies, regulators, government authorities, courts, tribunals or any person or entity to whom OAL, OCL or their respective subsidiaries or affiliates are under a legal, regulatory or binding obligation to disclose the Data.
11. For the avoidance of doubt, nothing in this Privacy Policy Statement shall, by itself, constitute your consent or indication of no objection to the use or provision of your personal data for direct marketing by OAL, OCL, any

Programme Organiser, Merchant, affiliate or other third party. Any direct marketing by OCL, including personalised offers, promotions or benefits relating to OCL products and services and/or your Octopus Rewards Platform Account, shall be administered by OCL in accordance with OCL's applicable personal information collection statement, privacy policy statement and direct marketing consent arrangements. OAL will not transfer or disclose your personal data to Merchants, Programme Organisers, OAL's affiliates, OCL's affiliates or other third parties for their own direct marketing use unless permitted under applicable laws and with any required consent or indication of no objection from you.

ACCURACY AND RETENTION OF PERSONAL DATA

12. Personal data collected and maintained by the Company shall be as accurate, complete, and up-to-date as is necessary for the purpose for which it is to be used.
13. Personal data will not be kept longer than necessary for the fulfilment of the purpose for which the personal data is collected or used. Personal data that is no longer required would be erased unless such erasure of personal data is prohibited under any law or it is in the public interest for the data not be erased. Should there be a need to retain the personal data for statistical purposes, such data would be anonymized so that the individuals concerned could no longer be identified.
14. We will destruct/destroy records containing personal data as and when necessary and in accordance with the Company's policies and procedures. Destruction of paper records would be carried out by irreversible means and electronic records would be cleared or destroyed from storage media before disposal by means of sanitization or physical destruction.

SECURITY OF PERSONAL DATA

15. We treat security as our top priority. We will strive to ensure that Personal Data will be protected against unauthorized or accidental access, processing or erasure. In doing so, we have implemented appropriate physical, electronic and managerial measures and controls to safeguard and secure the Personal Data.
16. Our web servers are protected by appropriate firewalls which will be kept up-to-date. However, as the security of ordinary email cannot be guaranteed, you should not send to us any email containing any Personal Data.
17. We will not keep Personal Data longer than is necessary for the fulfillment of the purposes (including any directly related purpose) for which they are, or are to be, used. We will purge unnecessary Personal Data from our system in accordance with our internal procedures.

ACCESS AND CORRECTION OF PERSONAL DATA

18. You have the right to ask us if we hold any Personal Data about you and if so, to request a copy of some or all of your Personal Data. If you would like to make such a request, please submit the "Data Access Request Form" (the prescribed form (form:OPS003) can be downloaded from the following link <http://www.pcpd.org.hk/english/publications/files/Dforme.pdf>), along with appropriate proof of identity (a copy of the applicant's Hong Kong Identity Card or Passport) to our Data Protection Officer at the address below. We may charge you a fee at a level permitted by the Ordinance for this service.
19. You have the right to request OAL not to use your Personal Data for direct marketing purposes, where applicable. For direct marketing by OCL, you may update your direct marketing preference under the "Direct Marketing" setting in the Octopus Mobile App or through such other means as announced by OCL from time to time, in which case OCL will cease to use your personal data for such direct marketing at no cost to you..
20. You also have the right to ask us to correct your Personal Data which you consider as inaccurate by writing to our Data Protection Officer at the address below.
21. We will allow your data access request or correction request unless we consider that there is a sound reason under the Ordinance or other relevant law to reject the request.
22. The address of our Data Protection Officer is 46/F., Manhattan Place, 23 Wang Tai Road, Kowloon Bay, Kowloon, Hong Kong. Our Data Protection Officer's email address is dpo@octopus.com.hk

LINKS TO OTHER WEBSITES

23. Our website may, from time to time, contain links to other websites. This Privacy Policy Statement only applies to this website so when you link to other websites you should read their own privacy policies.

CHANGE OF OUR PRIVACY POLICY

24. We keep our privacy policy under regular review and we will place any update on this webpage. Any change, update or modification will be effective immediately upon posting on this webpage. This Privacy Policy Statement was last updated on 2 July 2026.

INTERNAL PRACTICES

25. Our Data Protection Officer is responsible for monitoring and supervising compliance with the Ordinance within the Company. We maintain the

following measures to ensure compliance with the Ordinance:

- a. log books are kept to record all refusal of data access and correction requests and the reasons for their refusal;
- b. a "Personal Information Collection Statement" is included as far as practicable in the application forms for services provided by the Company;
- c. internal privacy policies, guidelines and manuals are provided for use by staff of the Company. Such policies, guidelines and manuals will be reviewed and revised in a timely manner to meet up-to-date privacy protection developments and standards.

ENGLISH VERSION

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

CONDITIONS

27. Nothing in this Privacy Policy Statement shall affect the rights and obligations of the Company under the Conditions.