Scout Association of Hong Kong **15 November 2026**
Standing Circular **Circular No. 04/2026**
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Scout Association of Hong Kong
Privacy Policy Statement

This Circular substitutes Policy Circular No. 11/2018 issued on 1 January 2018.

1. Preamble

1.1 Scout Association of Hong Kong respects and protects personal data as required by the Personal Data (Privacy) Ordinance, Chapter 486, Laws of Hong Kong ("PDPO") and the Code of Conduct issued from time to time by the Privacy Commissioner for Personal Data.

1.2 This Privacy Policy Statement demonstrates our top management's commitment and provides rules and practices that we will follow, stressing the importance of maintaining and preserving the confidentiality, integrity, safety, sensitivity and availability of personal data collected and kept by us.

1.3 We will comply with the Data Protection Principles ("DPP") and the related provisions as set out in the PDPO and the relevant Code of Conduct.

2. Effective Date

2.1 This policy statement was updated to become effective from 15 November 2026 onwards.

3. DPP1 - Collection of Data

3.1 We only collect personal data directly related to our functions, activities, visions and missions in a fair and lawful way. When we collect personal data from individuals, we will provide them with a Personal Information Collection Statement ("PICS") upon or before the collection in an appropriate format and manner (e.g. in the same paper form or web page that collects the personal data). We will state the purpose(s) for which personal data will be used - it being necessary and adequate but not excessive for such purpose(s), whether it is obligatory or voluntary for the individuals to supply their personal data, the consequences for failing to supply the obligatory information, the classes of persons to whom the personal data may be transferred or disclosed, the requisite information about the use and/or provision of personal data for all purpose(s) including direct marketing, the rights of access and correction of their personal data and the contact details of our Data Protection Officer who will handle such access and correction requests.

3.2 For our underage members who are below the age of 18, we will not collect their personal data without obtaining prior consent from their parents or guardians.

3.3 A PICS will also be given whenever we collect information online or offline from our members and visitors (that means information about them and which identifies them, including information about their use or visit of our website and applications). The most common examples in which information of a data subject is collected online are filling in an online registration forms and online payment gateway. The PICS given in the original registration form shall cover the subsequent collection activities.

3.4 Further, when you browse our websites, cookies will be stored in your computer's browser. Information may also be collected from you without your being aware of it.

3.5 The purpose(s) of using cookies in our websites are to remember the font size you have chosen in the site and also to facilitate the security checking (the test that asks you to enter the validation code displayed on screen) in all the online forms. You have a choice not to accept the cookies. If you do not accept the cookies, the site would not be able to remember the font size you have chosen and you would not be able to make any online submission. Our websites do not use cookies to collect your personal data. When you visit our websites, we will record your visit only as a "hit" for statistical purpose(s). The webserver makes a record of your visit that includes your IP addresses (and domain names), the types and configurations of browsers, language settings, geo-locations, operating systems, previous sites visited, the time/duration and the pages visited (webserver access log). We do not use, and have no intention to use, the websites visitors' data to personally identify anyone.

3.6 Common types of personal data collected include personal details, emergency contacts, education and qualifications, appointment information, health condition, training progress, payment details and welfare information.

3.7 We use the webserver access log for the purpose of maintaining and improving our websites such as to determine the optimal screen resolution, which pages have been most frequently visited, etc. We use such data only for website enhancement and optimisation purpose(s).

3.8 We accept payments for the membership / training / activity fees through payment gateway. In order to process the payment of the fees via payment gateway, you are required to provide personal information including but not limited to your credit card and billing contact information to payment gateway which is managed by a company registered under the laws of the Hong Kong Special Administrative Region.

4. DPP2 – Accuracy and Storage of Data

4.1 We will take all reasonably practicable steps to ensure that the personal data collected is accurate and is not kept longer than is necessary for the fulfilment of the purpose(s) for which the data is used. If we engage a data processor for handling personal data, we shall adopt contractual or other means to ensure that the data processor would comply with the retention requirement.

4.2 As required by section 26 of the PDPO, we will take all reasonably practicable steps to erase personal data that is no longer required for the purpose(s) for which the data is used, unless erasure is prohibited by law or is not in the public interest.

5. DPP3 – Use / Transfer of Data and Direct Marketing

5.1 We will prohibit the use of personal data collected for any new purpose(s) which are unrelated to the original purpose(s), unless express and voluntary consent has been obtained.

5.2 Use of personal data includes transfer of data. Transfer of data includes transfer to any recipients within or outside Hong Kong. Where necessary, we may transfer your personal data outside Hong Kong. When doing so, we comply with the laws of Hong Kong, making sure appropriate safeguards are in place. We will not transfer data unless:

- The transferee's data protection law is substantially similar to or serve the same purpose(s) as PDPO;
- Consent has been given or it is not practicable to obtain the required consent which would have been given;
- The transfer is for the avoidance or mitigation of adverse action against those providing the data; or
- All reasonable precautions and all due diligence have been taken, including the adoption of standard contract or recommended model contractual clauses as appropriate.

5.3 For overseas Jamborees and other activities, we are invariably requested by the overseas National Scout Associations to provide them with personal particulars (including passport copies) of the participants. Applicants for such events would be expressly reminded in the relevant application form that we are collecting their personal data for and on behalf of the overseas National Scout Associations, and that we will also be using such personal data to consider and process the applications.

5.4 For our underage members who are under 18, we will obtain the above-mentioned consent from their parents or guardians.

6. DPP4 – Security of Data

6.1 We will take all reasonably practicable steps to protect the personal data we hold against any data breach and not exposing the data to the risk of unauthorised or accidental access, processing, erasure, loss or use, which could be a result of cyber-attack, flood, fire, theft or wrongful transfer of data. We will have particular regard to –

- The amount and sensitivity of the personal data held;
- The likelihood of adverse consequences for affected individuals; and
- Adequate education and training of the responsible officers in our Association.

6.2 Our internal IT systems are developed and maintained by in-house staff and local third-party service providers. The third-party service providers do not have access to personal data stored in our internal IT systems except when they are carrying out trouble-shooting on the systems under the supervision of our staff.

6.3 Our websites are developed and maintained by local third-party service providers. All service providers are bound by contractual duty to keep any data they come into contact confidential and against unauthorised access, use and retention.

6.4 If there is a sub-contracting arrangement, we shall obtain assurance from the third-party service provider that the same level of protection (both technical and administrative) and compliance controls (monitoring and remedial actions) are equally applicable to their sub-contractors.

6.5 If we engage a data processor (e.g. cloud service providers) to process the personal data held, we will adopt contractual or other means in the outsourcing arrangements to ensure that the data processor comply with the data security requirement.

7. DPP5 – Transparency and Openness

7.1 As manifested in this Statement, we take all reasonably practicable steps to ensure openness of our personal data policy and practice, including the kind of personal data held, the main purpose(s) for holding it, the ways we will be using the data collected, how related consent may be withdrawn and how a complaint may be made if there are concerns about the ways we are using the data.

8. DPP6 – Access to and Correction of Data

8.1 Those who have their personal data collected by us have the right to request for access to ("DAR") and correction of ("DCR") such data, and a copy of their personal data under our control or custody.

8.2 A DAR may be made on the Own Personal Data Request Form (R03).

8.3 A DCR may be made on the Adult Member Registration Form (R01), or by way of a letter or email message for single or multiple update(s) or correction(s).

8.4 As required under the PDPO, we will comply with a DAR / DCR within 40 days after receiving it. If we have reasonable grounds, as provided under the PDPO, to refuse compliance with the DAR, we will inform the requester in writing of the reasons for the refusal before the expiration of the 40 days' period. These grounds include (but not limited to):

- The DAR/DCR does not provide sufficient information to identify the requestor or the data subject;
- The DAR cannot be complied with without disclosing the personal data of a third party;
- Complying with the DAR is prohibited under the PDPO or any other laws;
- We are not satisfied that the personal data to which the DCR relates is inaccurate.

8.5 No matter whether the DAR/DCR is to be complied with or refused, we may charge a reasonable fee so long as it is permitted by the PDPO, and such fee will not be more than the direct cost involved. We will also maintain a log book to record all refusals made.

9. Exemptions

9.1 PDPO provides a number of exemptions from some compliance requirements under particular circumstances. The commonly used public interest exemptions are the prevention and investigation of crime, legal proceedings, statistics, research and emergency situations. Other examples include public and national security, news activity, physical / mental health of the individual concerned.

9.2 We will not simply rely on the exemption(s) as a matter of routine but will consider all relevant factual circumstances of each case to assess whether there is cogent evidence in law to justify the application of the exemption.

10. How to complain

10.1 If you have any concerns about our use of your personal data, you can make a complaint to us by contacting the Data Protection Officer: -

Email: dpo@scout.org.hk
Telephone: 2957 6334

10.2 If you remain unhappy with how we have handled your data after raising a complaint with us, you can also complain to the Privacy Commissioner for Personal Data, Hong Kong at:

Address: Unit 1303, 13/F, Dah Sing Financial Centre,
248 Queen's Road East, Wanchai, Hong Kong.
Hotline: 2827 2827
Email: complaints@pcpd.org.hk
Website: https://www.pcpd.org.hk/

11. We keep our privacy policy statement under regular review.



Terence LO
Deputy Chief Commissioner (Management)