



## **Anti-Doping Organization of Hong Kong, China**

### **PRIVACY POLICY STATEMENT**

#### **1 Statement**

**Anti-Doping Organization of Hong Kong, China** (the Organization), as a Data User, respects personal data privacy and is committed to fully implementing and complying with the data protection principles and all relevant provisions of the Personal Data (Privacy) Ordinance (Cap 486) and codes of practice issued by the Privacy Commissioner for Personal Data. The Organization is equally committed to ensuring that all its officials, staff and agents uphold these obligations. The Organization undertakes to:

- 1.1 collect personal data directly related to the functions and activities of the Organization only for lawful purposes, and by lawful and fair means;
- 1.2 take all reasonably practicable steps to ensure that personal data are accurate, up-to-date and kept no longer than necessary;
- 1.3 use the personal data collected only for purposes or directly related purposes for which the data were to be used at the time of collection, unless the Data Subject concerned has given his consent to a change of use or such use is permitted by law;
- 1.4 take all reasonably practicable steps to ensure that personal data are protected against unauthorized or accidental access, processing, erasure or other use;
- 1.5 take all reasonably practicable steps to ensure that the public is informed of the kinds of personal data that the Organization holds and the purposes for which the data are to be used; and
- 1.6 permit Data Subjects to access and correct their personal data and process the data access / correction requests in a manner permitted or required by law.

#### **2 Types of Personal Data Processed by the Organization**

The Organization, in the course of its operations, may process the following types of personal data of Board of Directors, Members, Chairperson, athletes, staff, participants and other individuals:

- 2.1 Identification data (e.g. name and Hong Kong Identity Card / passport details);
- 2.2 Personal details (e.g. age, sex, date of birth, marital status, occupation, address, telephone number, e-mail address and other contact details);
- 2.3 Employment record (e.g. job applications, past and present staff's job particulars, details of salary, payments, benefits, leave, training records, group medical and

- dental insurance records, mandatory provident fund schemes participation, performance appraisals, and disciplinary matters);
- 2.4 Payment details (e.g. bank / credit card details, for enrolment of events / activities);
  - 2.5 Health information (e.g. data from medical / anti-doping tests and emergency contact details);
  - 2.6 Vehicle information (e.g. car plate number, for the use of parking facilities at venues of events / activities); and
  - 2.7 Images (e.g. photo of an individual participating in the Organization's events / activities, and image of a visitor to the Organization office captured by CCTV system).

### **3 Main Purposes for Processing Personal Data**

- 3.1 The purposes for which the Organization processes personal data are:
  - 3.1.1 To verify an individual's identity;
  - 3.1.2 To ensure compliance with the rules and regulations of the Organization;
  - 3.1.3 To maintain and develop services, including programmes, activities, and events;
  - 3.1.4 To organize, conduct and promote the Organization's events / activities;
  - 3.1.5 To maintain relationships with the Organization's members;
  - 3.1.6 To handle complaints / enquiries as appropriate;
  - 3.1.7 To carry out surveys and statistical analyses;
  - 3.1.8 For purposes related to recruitment of staff, manpower management, and maintenance of employment relationship;
  - 3.1.9 For security purposes; and
  - 3.1.10 Where otherwise reasonably necessary for the Organization to carry out its functions.

### **4 Lawful Bases for Processing Personal Data**

- 4.1 The Organization only processes personal data where there is a lawful basis for doing so.
  - 4.1.1 Consent: the Data Subject has given clear consent for the Organization to process their personal data for a specific purpose.
  - 4.1.2 Contract: the processing is necessary for a contract the Organization has with a Data Subject, or because a Data Subject has asked the Organization to take specific steps before entering into a contract.
  - 4.1.3 Legal obligation: the processing is necessary for the Organization to comply with the law.
  - 4.1.4 Vital interests: the processing is necessary to protect the Data Subject's life.
  - 4.1.5 Public task: the processing is necessary for the Organization to perform a task in the public interest.
  - 4.1.6 Legitimate interests: the processing is necessary for the Organization's legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

- 4.2 In addition, the Organization will on occasion need to process special category personal data (e.g. when conducting medical / anti-doping tests) or criminal records information (e.g. when carrying out No Criminal / Sexual Conviction Record Checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required.

## **5 How the Organization Collects Personal Data**

- 5.1 Generally, the Organization collects personal data from the individual directly. This may be via a form, an online platform or simply in the ordinary course of interaction or communication.
- 5.2 In some cases, personal data will be supplied by third parties (e.g. a National Sports Association or other professionals or authorities working with that individual) or collected from publicly available resources.
- 5.3 The Organization will not collect personal data from a minor without prior consent from a person with parental responsibility for the minor.

## **6 Access to and Sharing of Personal Data**

- 6.1 The Organization may be required to share personal data with third parties, such as:
  - 6.1.1 professional advisers (e.g. lawyers, insurers and auditors);
  - 6.1.2 government authorities;
  - 6.1.3 partners or related organizations (e.g. International Olympic Committee, Organizing Committee of multi-sports Games); and
  - 6.1.4 where appropriate, parties who will be contacted by us during the handling of a complaint / enquiry case including the party being complained against and/or other parties concerned.
- 6.2 For the most part, personal data collected by the Organization will remain within the Organization and will be processed by appropriate individuals on a “need to know” basis.
- 6.3 Some of the Organization’s processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. All the Organization’s service providers are bound by contractual duty to keep confidential any data they come into contact with against unauthorized access, use and retention.

## **7 Information Collected on the Organization’s Websites**

- 7.1 A cookie is a small amount of data created in a computer when a person visits a website on the computer. It often includes an anonymous unique identifier. A cookie can be used to identify a computer. Cookies are used by the Organization to collect statistics about the number of visits of users to the Organization’s websites and the users' preference of websites and online services offered on the Organization’s websites. Users may choose to accept or reject cookies. If users reject cookies, they will not be able to use some of the functions of the websites, such as saving preferences and accessing some online services.

7.2 When a user visits the Organization's websites, the webserver makes a record of the visit that includes the user's IP addresses (and domain names), the types and configurations of browsers, language settings, geo-locations, operating systems, previous sites visited, and time/duration and the pages visited (webserver access log). The Organization uses the webserver access log for the purpose of maintaining and improving its websites such as to determine the optimal screen resolution, which pages have been most frequently visited etc. The Organization uses such data only for website enhancement and optimization purposes. The Organization does not use, and have no intention of using the visitor data to personally identify anyone.

## **8 Protection Measures**

The Organization takes appropriate steps to protect the personal data it holds against loss, unauthorized access, use, modification or disclosure. For example, training on personal data protection is provided to staff members who need to handle personal data in their daily work.

## **9 Retention**

Personal data will not be kept longer than is necessary for the fulfilment of the purpose for which it is collected. Personal data that is no longer needed is either irreversibly anonymised (and the anonymised information will be retained) or securely destroyed.

## **10 Data Access and Correction**

10.1 Data access requests should be made in writing using the form prescribed by the Privacy Commissioner for Personal Data<sup>1</sup>. The completed form should be sent directly to the Data Protection Officer by fax (2890 3677), by email (antidoping@antidoping.hk), or in person or by post to:

Anti-Doping Organization of Hong Kong, China  
Upper 10/F, Sports Complex Building, South China Athletic Association  
88 Caroline Hill Road, Causeway Bay, Hong Kong

10.2 When handling a data access or correction request, the Organization will check the identity of the requester to ensure that he is the person legally entitled to make the data access or correction request.

## **11 Enquiries**

Any enquiries regarding the Organization's personal data privacy policy and practice may be addressed to the Data Protection Officer by post to the above correspondence address, via email to antidoping@antidoping.hk or by telephone to 2890 3644 during office hours.

*The Organization's Privacy Policy Statement is kept under regular review. This statement was last updated on 1 April 2024.*

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<sup>1</sup> The data access request form is available on the Office of the Privacy Commissioner for Personal Data's website: <https://www.pcpd.org.hk/english/publications/files/Dforme.pdf>.



## **Anti-Doping Organization of Hong Kong, China**

### **CODE OF PRACTICE ON DATA PROTECTION**

#### **1 Introduction**

This Code of Practice provides guidance and good practices in safeguarding personal data privacy and ensures the Organization's compliance with the Personal Data (Privacy) Ordinance (Cap. 486). The Organization shall ensure that it is made known to all Officials of the Organization, including Board of Directors, Members, Chairperson, Committee Members and staff members. Sections marked with asterisks (\*) are particularly relevant to all staff members.

#### **2 Definition of Personal Data\***

Personal data refers to information that relates to a living person and can be used to identify that person. It exists in a form in which access to or processing of is practicable. Examples of personal data protected by the Ordinance include names, phone numbers, addresses, identity card numbers, photos, medical records and employment records, etc.

#### **3 Six Data Protection Principles**

3.1 The Privacy Commissioner for Personal Data recognizes six Data Protection Principles (DPPs) that represent the core of the Ordinance:

DPP1 - Data Collection Principle

DPP2 - Accuracy & Retention Principle

DPP3 - Data Use Principle

DPP4 - Data Security Principle

DPP5 - Openness Principle

DPP6 - Data Access & Correction Principle

3.2 The following paragraphs provide practical guidance on how to adhere to the six DPPs:-

#### **4 Collection of Personal Data (DPP1)\***

4.1 The purpose of collection must be directly related to the functions or activities of the Organization, and the data collected in relation to a specified purpose should be adequate but not excessive.

4.2 During the collection of personal data, Data Subjects should be informed explicitly of the following:

4.2.1 purpose for which the data is collected;

4.2.2 parties to whom the data may be transferred;

- 4.2.3 whether it is obligatory or voluntary to supply the data, and the consequences of not doing so;
- 4.2.4 rights of the Data Subject to request access to and correction of the data held by the Organization; and
- 4.2.5 the person to be contacted for data access and correction.
- 4.3 A Personal Information Collection Statement (PICS) should be included when collecting personal data directly from a Data Subject. **Appendix I** lists out some circumstances under which a PICS is or is not required. A sample of PICS is shown at **Appendix II**.
- 4.4 When proposing to collect HKID card numbers or copies, consideration should be given to adopting other less privacy-intrusive alternatives. For example, collecting the first four digits of HKID card numbers should be sufficient for the purpose of identification of persons with the same names. Staff cards or other photo identification documents could be used instead of HKID card to check the identity of a person. For further information, reference should be made to the relevant Code of Practice<sup>2</sup> issued by the Office of the Privacy Commissioner for Personal Data.

## 5 Accuracy and Retention of Personal Data (DPP2)\*

- 5.1 Officials holding personal data should review and update the personal data they keep periodically to ensure that it is accurate. Inaccurate data and data no longer in use should be deleted.
- 5.2 The Organization should keep a personal data inventory to keep track of the types of personal data it holds and how the personal data is being processed. Each Head of Office should prepare the updated personal data inventory of his respective office annually (or when there is any new project that involves the collection of a new category of personal data) and submit it to the Data Protection Officer (DPO) for filing. A sample personal data inventory is shown at **Appendix III**.
- 5.3 Officials should ensure that personal data is not kept longer than necessary to fulfil the purpose for which it is used.
- 5.4 As a good practice, personal data not collected directly by the Organization but transferred from another source should be disposed of properly immediately after use. Fresh data should be requested each time it is required.
- 5.5 The below table shows the recommended maximum retention periods for different types of personal data held by the Organization:

Type of Personal Data		Maximum Retention Period
<b>Human Resources</b>		
<b>Events / Programmes</b>	Personal data of past participants	7 years from the completion of the event / programme
<b>Multi-sports Games</b>	Personal data of Delegation members	8 years from the completion of the Games in accordance with the Financial Guidelines of

<sup>2</sup> [https://www.pcpd.org.hk/english/data\\_privacy\\_law/code\\_of\\_practices/files/compliance\\_guide\\_e.pdf](https://www.pcpd.org.hk/english/data_privacy_law/code_of_practices/files/compliance_guide_e.pdf)

**Annex VI**

<b>Type of Personal Data</b>		<b>Maximum Retention Period</b>
		Olympic Solidarity
<b>Membership</b>	Personal data of past individual members / representatives of member associations	2 years from the date of cessation of membership / representation
<b>Employment record</b>	Job applications of unsuccessful candidates	2 years from the completion of the recruitment exercise
	Personal files of past employees	7 years from the date of cessation of employment
<b>Complaints</b>	Personal data of complainants / complainees	2 years from the completion of the complaint, after which all related personal data shall be deleted or anonymized (unless there is any relevant statutory or regulatory requirements to keep the data for a longer period of time)
<b>Other</b>	Personal data in Lost and Found report	2 years from the reporting date
	Personal data in visitor log book	6 months from the reporting date
	Personal data in master key log book	6 months from the date of the returning of the key
	Recorded images captured by CCTV	30 days from the recording date if no incident of security concern is discovered or reported
<b>Anti-Doping Hong Kong</b>		
<b>Testing</b>	Personal data processed in connection with anti-doping tests and anti-doping rule violation	In accordance with the “World Anti-Doping Code and International Standard for the Protection of Privacy and Personal Information”
<b>Agents</b>	Applications of unsuccessful candidates of part-time Doping Control Officers (DCO)	2 years from the completion of the recruitment exercise
	Personal data of past, non-serving DCOs	10 years from the date of cessation of appointment
	Personal data of past, non-serving Chaperones	10 years from the date of last appointment
	Personal data of past Phlebotomists and Registered Nurses	10 years from the date of last appointment

Type of Personal Data		Maximum Retention Period
<b>Education</b>	Personal data of anti-doping education talk applicants	5 years from the completion of the talk
	Personal data of attendees of education talk, conference or outreach who subscribe to receiving information from SF&OC / HKADC via email	None (except when a subscriber requests to unsubscribe or the email address is found invalid, in which case the data shall be deleted immediately)
<b>Others</b>	Personal data of whistleblowers	10 years from the completion of the case
	Personal data of complainants / complainees	2 years from the completion of the complaint

## 6 Use of Personal Data (DPP3)\*

- 6.1 Personal data must be used for the purpose for which the data is collected or for a directly related purpose, unless voluntary and explicit consent with a new purpose is obtained from the Data Subject.
- 6.2 When personal data is transferred to another party, the transferor should remind the receiving party to process and handle it with an appropriate level of confidentiality and to use the data only for the agreed purpose.
- 6.3 In direct marketing (e.g. promoting programmes / activities, soliciting donations / contributions, etc.):
  - 6.3.1 Written or verbal consent must be obtained from Data Subjects for the use of their personal data. Data Subjects should also be informed of the classes of marketing subjects in relation to which the Data Users are going to carry out direct marketing. A sample of a consent for direct marketing is shown at **Appendix II**.
  - 6.3.2 If only verbal consent is obtained from a Data Subject, a written confirmation should be issued to the Data Subject within 14 days after the consent is received.
  - 6.3.3 The written confirmation should include:
    - date of receipt of the consent;
    - permitted types of personal data; and
    - permitted class of marketing subjects.
- 6.4 Valid consent is considered not obtained if a Data Subject refuses to provide his contact information and as a result the written confirmation could not be sent, or when the written confirmation sent to the Data Subject is returned undelivered.



## 7 Data Security (DPP4)\*

Officials should take all practicable steps to safeguard personal data from unauthorized or accidental access, processing, erasure, loss or other uses by adopting the following measures:

### 7.1 Access control

- Personal data collected and retained should be disseminated to another party only if necessary. Access should be allowed on a “need to know” and “need to use” basis (e.g. when a staff who handles human resources matters is transferred to another post, his right of access to personnel records should cease immediately).
- Measures must be in place to ensure the integrity, prudence and competence of authorized persons (e.g. requiring new staff to read the Code of Practice on Data Protection, requiring staff to participate in data protection refresher workshops periodically, signing of a confidentiality statement by Officials, etc.).
- Personal data should not be taken away from the office, unless under special circumstances (e.g. events that take place outside the office).
- If a Data Processor (e.g. service provider) is engaged, contractual or other means must be adopted to prevent unauthorized or accidental access, processing, erasure, loss or use.

### 7.2 Data storage

- An appropriate physical location should be identified where the personal data can be safely stored (e.g. lockable filing cabinets or rooms with controlled access or which can be locked when unoccupied). Files containing personal data should not be left open on desks or in areas where they can be seen by unauthorized persons.
- Personal or sensitive data should not be stored in portable devices, such as USB flash drives, notebooks or tablets. In case such data has to be stored in portable / mobile devices temporarily, the data stored should be the minimum necessary and should be password-protected. Moreover, the data must be deleted as soon as the tasks for which it is required have been completed.

### 7.3 Data transmission

- Officials should adopt appropriate measures to ensure the secure transmission of personal data (e.g. documents containing personal data should be put in a sealed envelope marked “private and confidential” and “to be opened by addressee only” with a specified addressee).
- Officials should make use of shared drives in the computing system if available and, as far as possible, communicate personal information in a safe and restricted environment.
- Personal or sensitive data, when sent electronically, should be password-protected. Email addresses and attachments should be double -checked to ensure that they are correct.
- When sending out a mass email, BCC or mail merge should be used to avoid disclosing the email addresses of recipients.

#### 7.4 Data disposal

- Personal data should be disposed of properly after the specified retention period. For example, hard copy documents should be shredded while disks and memory sticks should be formatted.

#### 7.5 Others

- Information which can lead to the identification of the Data Subject in statistical analysis should be anonymized.

### 8 **Openness (DPP5)**

The Organization will make available the following information to all stakeholders:

- 8.1 Personal data policies and practices adopted;
- 8.2 Types of personal data held; and
- 8.3 Purposes for which the personal data is used or to be used.

### 9 **Data Access and Correction (DPP6)**

- 9.1 A Data Subject must be given access to his personal data and allowed to make corrections if it is inaccurate.
- 9.2 A data access request is a request made by an individual to request the Data User:
  - 9.2.1 to inform him whether the Data User holds personal data of which the individual is the Data Subject; and
  - 9.2.2 if the Data User holds such data, to supply him with a copy of such data.
- 9.3 Data Subjects are encouraged to make data access requests by means of the form prescribed by the Privacy Commissioner for Personal Data<sup>3</sup>.
- 9.4 Data access requests shall be processed by a DPO who has undergone appropriate training. When the Organization receives a data access request, the DPO should:
  - 9.4.1 ascertain the identity of the requestor; and
  - 9.4.2 assess whether the Organization holds the relevant personal data.
- 9.5 If the Organization holds the relevant personal data, a copy of the requested data should be supplied to the Data Subject within 40 calendar days after receiving the request.
- 9.6 If the Organization does not hold the requested data, the requestor should still be informed in writing within the 40-day time limit.
- 9.7 The Organization shall charge a fee (at \$5 per A4-size page) for complying with a data access request.
- 9.8 The Organization may refuse to comply with a data access request if:
  - 9.8.1 it is not supplied with sufficient information to identify the requestor;
  - 9.8.2 it cannot comply with the request without disclosing the personal data of a third party; or
  - 9.8.3 where compliance with the request is for the time being prohibited under the Personal Data (Privacy) Ordinance or any other ordinance.
- 9.9 A log book should be kept to register all data access requests for the past four years, stating reasons if any of them are refused.

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<sup>3</sup> <https://www.pcpd.org.hk/english/publications/files/Dforme.pdf>.

**10 Opt-out Request\***

- 10.1 In direct marketing, a Data Subject may at any time require a Data User to cease using his personal data. Such “Opt-out” requests may be communicated verbally or in writing.
- 10.2 To comply with a Data Subject’s opt-out request, staff members involved in direct marketing should maintain an “Opt-out List” of all persons who have indicated that they do not wish to receive further marketing approaches.

**11 Handling of Data Breach\***

- 11.1 In case of a data breach, the incident should be reported to the DPO, the respective Head of Office, and the Chairperson in the first instance.
- 11.2 Essential information related to the breach should be gathered.
- 11.3 The following parties may also be notified as appropriate:
  - 11.3.1 law enforcement agencies;
  - 11.3.2 Office of the Privacy Commissioner for Personal Data; and
  - 11.3.3 IT experts.
- 11.4 Measures should be adopted to contain the breach (e.g. cessation of a system function or access right).
- 11.5 An assessment of the potential damage and harm caused by the breach should be made.
- 11.6 Consideration should be taken to notify affected Data Subjects and relevant parties of the breach. When Data Subjects are not immediately identifiable or where public interest exists, public notification through the Organization’s website or media may be considered.
- 11.7 A thorough investigation into the breach should be carried out. The investigation results should be reported to the Chairperson and kept in a detailed report.
- 11.8 Areas for improvement should be identified to prevent the breach from recurring.
- 11.9 The Data Breach Information Sheet at **Appendix IV** should be used to consolidate information relating to the breach, take remedial actions and conduct post-incident review.

**12 Other Relevant Information\***

- 12.1 The Deputy Manager (Admin & HR) of the Organization shall be the DPO of the Organization.
- 12.2 This Code of Practice shall undergo review once every five years. This version was last updated on 1 April 2024.



## Anti-Doping Organization of Hong Kong, China

### Circumstances under which a Personal Information Collection Statement (PICS) is / is not required

	<b><i>PICS required:</i></b>	<b><i>PICS <u>not</u> required:</i></b>
Event registration	Personal data is collected directly from participants.	Personal data of corporate team participants is provided by the organization they represent.
Staff recruitment	Personal data is collected directly from job applicants.	N/A
Membership programme	Personal data is collected directly from members.	N/A
Lucky draw	Contact details is collected directly from participants.	N/A

*The list of circumstances outlined above is for reference only and is by no means exhaustive. If in doubt, advice should be sought when deciding if a PICS is required for each individual case.*



**Anti-Doping Organization of Hong Kong, China**  
**Personal Information Collection Statement (Sample)**

1. The personal data collected is used by the Organization for \_\_\_\_\_ (purpose) or other directly related purpose(s).
2. Please note that it is mandatory for you to provide the personal data marked with asterisks. In the event that you do not provide such personal data, the Organization may not be able to provide you with \_\_\_\_\_ (service).
3. Your personal data held by the Organization will be kept confidential within the retention period, but it may be shared with other parties, including \_\_\_\_\_ (other organizations), for the purpose(s) stated above.

In accordance with the Personal Data (Privacy) Ordinance, you have the right to access, amend, and ask for a copy of your personal data held by the Organization. Requests for access and/or correction can be made to the Data Protection Officer in writing via email [antidoping@antidoping.hk](mailto:antidoping@antidoping.hk) or by post to Anti-Doping Organization of Hong Kong, China, Upper 10/F, Sports Complex Building, South China Athletic Association, 88 Caroline Hill Road, Causeway Bay, Hong Kong. A fee at \$5 per A4-size page shall be charged to cover the administrative cost.

4. For further details, please refer to the Organization's Privacy Policy Statement at [link](#).

**Consent for Direct Marketing (if applicable)**

We intend to use the personal data (name, mobile phone number and email address) you provided in this form for the purpose of sending you information about activities organized by us. We cannot use your personal data unless we have received your consent or indication of no objection.

If you do not agree to such use, please indicate your objection by ticking the box below:

☐ I do not wish my personal data to be used for the above-mentioned purpose(s).

\_\_\_\_\_  
Name and signature

Date:



**Anti-Doping Organization of Hong Kong, China**  
**Personal Data Inventory (Sample)**

<b>Office / Department:</b>	Admin & HR Department
<b>Category of record</b>	Personnel records
<b>Items of personal data contained in the record</b>	<ul style="list-style-type: none"> <li>- Name</li> <li>- Contact information (including address, mobile phone number and email address)</li> <li>- Bank account details</li> <li>- MPF scheme registration</li> <li>- Remuneration package</li> <li>- Leave records</li> <li>- Academic qualifications</li> </ul>
<b>Means of collection of the data</b>	Employee Information Form
<b>Purpose of collection and use of the data</b>	Handle employment-related matters
<b>Retention period of the data</b>	7 years after the employee has left the service
<b>Location for data storage</b>	Physical: filing cabinets of Admin Department Electronic: computer of DM (Department 1)
<b>Disclosure of data to any third parties including Data Processors (e.g. service providers) and the names and relevant details of third parties (Yes/No)</b>	No
<b>Possible location of transfer (e.g. cloud server location)</b>	N/A
<b>Purpose of disclosing the data and whether the disclosure complies with the Personal Data (Privacy) Ordinance (Cap 486)</b>	N/A
<b>Date of return or destruction by the Data Processor (if applicable)</b>	N/A
<b>Security measures adopted</b>	Filing cabinets are locked and the key is kept by DM.



**Anti-Doping Organization of Hong Kong, China**  
**Data Breach Information Sheet**

Office / Department:	
<b>A) Information of the Breach</b>	
<i>(i) General information of the breach</i>	
Description of the breach	
Date and time of the breach	
Location of the breach (e.g. which office, which computer server, etc.)	
Date and time of discovering the breach	
How the breach is discovered (e.g. discovered during routine system checking, known after reported by media, etc.)	
Nature of the breach (e.g. loss of data, database is hacked, etc.)	
Cause of the breach	
<i>(ii) Impact of the breach</i>	
Types of Data Subjects affected (e.g. staff, members, public, etc.)	
Estimated number of Data Subjects affected (Please state the respective number for each type of Data Subjects)	
Types of personal data affected (e.g. name, date of birth, HKID card number, address, telephone number, etc.)	
Medium holding the affected personal data (e.g. physical folders, USB, etc.)	
If the personal data is held in electronic medium, is the data encrypted?	
<b>B) Data Breach Notification to Regulatory Bodies</b>	
Are other regulatory bodies such as the Hong Kong Police Force or the Office of the Privacy Commissioner for Personal Data, Hong Kong being notified of the breach? If <u>yes</u> , please provide the date and details of each notification given.	
<b>C) Actions Taken / To be Taken to Contain the Breach</b>	
Brief description of actions <u>taken</u> to contain the breach	

Please evaluate the effectiveness of the abovementioned actions taken	
Brief description of actions that <u>will be taken</u> to contain the breach	
<b>D) Risk of Harm</b>	
Please assess the potential harm to Data Subjects caused by the breach and the extent of it	
<b>E) Data Breach Notifications to Data Subjects Affected</b>	
Dates and details of the data breach notifications issued to data subjects affected by the breach	
If no data breach notification is issued/will be issued, please state the consideration	
<b>F) Investigation Results</b>	
Cause(s) of the breach	
<b>G) Post-incident Review (To be completed by the Data Protection Officer)</b>	
Recommended improvement measures and the respective implementation date	
Date to review the effectiveness of the abovementioned improvement measures	

**Completed by**  
**(Head of Office)**

**Reviewed by**  
**(Data Protection Officer)**

Signature: \_\_\_\_\_ Signature: \_\_\_\_\_

Name: \_\_\_\_\_ Name: \_\_\_\_\_

Post \_\_\_\_\_ Post \_\_\_\_\_

Date: \_\_\_\_\_ Date: \_\_\_\_\_