

Policy title	Data Protection Policy
Company	Ventel Limited
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Confidentiality	Non-Public
Approved by	IS team
Introduction	This policy defines our commitment to protecting all personal and sensitive data in accordance with applicable laws and regulations (e.g., Personal Data (Privacy) Ordinance, GDPR). We outline clear roles, responsibilities, and security measures to prevent unauthorized access, disclosure, or misuse of data. All employees and contractors must strictly follow these procedures to maintain compliance and uphold our organization's reputation. Through continuous monitoring and regular training, we ensure data subjects' rights are protected while supporting smooth business operations.
Target audience	All employees and contractors
Change history	
01.01.2024	1.0 First version

DATA PROTECTION POLICY

Ventel Limited's management demonstrates a commitment to data protection by creating the policy and associated requirements, assigning specific roles and responsibilities, continuously developing a good data protection culture, and allocating appropriate resources.

Ventel Limited is responsible for compliance with the following:

- Personal Data (Privacy) Ordinance (An Ordinance to protect the privacy of individuals in relation to personal data, and to provide for matters incidental thereto or connected therewith;
- General Data Protection Regulation (GDPR, 2016/679);
- other applicable laws concerning privacy and personal data protection.

Ventel Limited understands its roles and responsibilities in the personal data processing.

Personal data in Ventel Limited are:

- processed lawfully, fairly and in a transparent manner in relation to the Data Subject (lawfulness, fairness and transparency);
- collected for specified, explicit and legitimate purposes (purpose limitation);
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation);
- accurate and, where necessary, kept up to date (accuracy);
- stored no longer than is necessary for the purposes for which the personal data are processed (storage limitation);
- processed in a secure manner that ensures the confidentiality, integrity and availability of personal data.

Ventel Limited is able to demonstrate compliance with this statement (accountability).

Ventel Limited respects the rights of the Data Subjects (the right to be informed, the right to access, the right to rectification, the right to erasure (the right to be forgotten), the right to restrict processing, the right to data portability, the right to object / right to opt-out, the rights in relation to automated decision making) and guarantees their observance.

Ventel Limited understands and assesses potential risks to the rights and freedoms of natural persons. If necessary, a data protection impact assessment (DPIA) is conducted.

Ventel Limited has implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including, among other things as appropriate:

- the encryption of personal data;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of incidents;
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

Ventel Limited's information security and privacy information management systems are implemented and continuously being improved.

The Data Subjects can contact us at privacy@ventel.hk.

The Data Protection Policy is subject to periodic assessment, revision and updating every two years or, if necessary, at shorter intervals to reflect changing conditions.