

# Third Sector Connect Ltd – Knowledge Barter Hub

## Experience sharing by Chi Heng Foundation Ltd on Personal Information Collection Statement - PCPD compliance check

1. In early Feb 2021, CHF received notice from the Office of the Privacy Commissioner for Personal Data (PCPD) that they have conducted a compliance check of CHF website, and found that CHF may have failed to provide donors with a statement which fully complies with the notification requirements under Data Protection Principle (DPP) 1(3) of Schedule 1 to the Ordinance (See Exhibit 1 for details).
2. PCPD specifically addressed to both online Donation Form and also Donation Form in pdf format for download. See Exhibit 2 for screen dump that does NOT meet the DPP 1(3) requirements.
3. CHF have then submitted a revised statement (See Exhibit 3) to PCPD and PCPD has accepted it as sufficient in meeting the requirement.
4. CHF then applied the revised statement to all relevant web pages/pdf before a deadline given
5. In summary, CHF has adopted 2 versions of Personal Information Collection (PIC) statement: 1) for donation purposes; 2) for non-donation related purposes (see Exhibit 4)
6. See Exhibit 5 for examples of PIC at the respective sites / pages of CHF website
7. PCPD advised CHF by post in early May 2021 that the case is closed with the revised Forms on CHF website

Exhibit 1	DPP 1(3) provides that on or before a data user collects personal data directly from a data subject, the data user shall take all practicable steps to inform the data subject of the following: <ol style="list-style-type: none"><li>1. Whether it is obligatory or voluntary for the individual to supply the data, and where it is obligatory, the consequences for failure to supply the data;</li><li>2. The purpose for which the data is to be used;</li><li>3. The classes of persons to whom the data may be transferred; and</li><li>4. The individual's rights to request access to a copy of his personal data and to request correction of the data, and the name or job title, and contact address of the responsible person to whom such request may be made.</li></ol>	
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Exhibit 2  
(Old format)

1) Online donation Form - "the Privacy Policy" carries a URL link to <https://chfaiidsorphans.com/privacy-policy/>

The screenshot shows the 'online Monthly Donation Form' for the Chi Heng Foundation. It includes a header with the foundation's logo and name. Below the header, there is a section titled 'Do you wish to receive newsletters and communications from CHF? (required)' with an email input field. A red box highlights a link to the privacy policy: 'By continuing, you accept <https://chfaiidsorphans.com/privacy-policy/> (required)'. Below this, there is a CAPTCHA question: 'To confirm that this form is not filled by a robot program, please answer this quiz in english: The Capital of China? (required)'. A 'Submit' button is at the bottom.

2) Donation form in pdf format :

The screenshot shows a PDF donation form. It includes fields for '持卡人姓名 (印刷) Cardholder Name (print):', '信用卡號碼 Card Number:', '到期日 Expiry Date:', and '簽署 Cardholder Signature:'. There are checkboxes for '7-Eleven 捐款 Donation via 7-Eleven', '繳費碼 PPS', and '支付寶 Alipay'. A barcode is present with the number 3389 9000 0000 0011 1. Below the form, there is a section titled 'Donation Form in pdf format for download' and a '聯絡我們 Contact Us' section with contact information for the Chi Heng Foundation.

Exhibit 3  
(New format)

1) Online Donation Form (accepted) : <https://chfaiidsorphans.com/online-monthly-donation-form/>

The screenshot shows the 'Revised statement in online donation form'. It includes a header with the foundation's logo and name. Below the header, there is a section titled 'Do you wish to receive newsletters and communications from CHF? (required)' with an email input field. A red box highlights a section titled 'Personal Information Collection Statement: CHF may use your contact information to issue receipts, letters and certificates, conduct donor analysis and communicate with you for newsletters, marketing materials and update of our services and fundraising activities through direct mailing, email, telephone etc. We will not sell and/or provide your personal data to any third party other than our staff, appointed volunteers and institutions who process payment and other necessary functions. The provision of personal data is purely voluntary; however, the donation may be delayed or cannot be processed if data is insufficient. You have the right to access, update and request CHF to stop using your personal data for the above purposes by notifying the office manager with email to info@chihengfoundation.com or by mail to G.P.O. Box 3923, Central, HK. Please also read our Privacy Policy at https://chfaiidsorphans.com/privacy-policy for more details.' Below this, there is a CAPTCHA question: 'I have read, understood and agreed to accept the CHF Personal Information Collection Statement and the Privacy Policy Statement. (required)'. Below this, there is a CAPTCHA question: 'To confirm that this form is not filled by a robot program, please answer this quiz in english: The Capital of China? (required)'. A 'Submit' button is at the bottom.

2) Donation Form in pdf format (accepted) :

The screenshot shows a PDF donation form. It includes fields for '電郵地址 Email:', '通訊位址 Mailing address:', 'Unit/Floor', 'Building name', 'Street name', and 'District'. There is a section titled 'Personal Information Collection Statement:' with text: 'CHF may use your contact information to issue receipts, letters and certificates, conduct donor analysis and communicate with you for newsletters, marketing materials and update of our services and fundraising activities through direct mailing, email, telephone etc. We will not sell and/or provide your personal data to any third party other than our staff, appointed volunteers and institutions who process payment and other necessary functions. The provision of personal data is purely voluntary; however, the donation may be delayed or cannot be processed if data is insufficient. You have the right to access, update and request CHF to stop using your personal data for the above purposes by notifying the office manager with email to info@chihengfoundation.com or by mail to G.P.O. Box 3923, Central, HK.' Below this, there is a section titled '捐款方法 Donation Method' with checkboxes for 'Visa' and 'Mastercard'. There are also fields for '信用卡號碼 Card Number:', '持卡人姓名 Cardholder's Name:', '到期日 Expiry Date (mm/yy):', and '持卡人簽名 Cardholder's Signature:'.

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<p>Exhibit 4 Type of PIC</p>	<p>a) for donation purposes;</p> <div style="background-color: #e0e0e0; padding: 10px; border: 1px solid #ccc;"> <p>Personal Information Collection Statement: CHF may use your contact information to issue receipts, letters and certificates, conduct donor analysis and communicate with you for newsletters, marketing materials and update of our services and fundraising activities through direct mailing, email, telephone etc. We will not sell and/or provide your personal data to any third party other than our staff, appointed volunteers and institutions who process payment and other necessary functions.</p> <p>The provision of personal data is purely voluntary, however, the donation may be delayed or cannot be processed if data is insufficient. You have the right to access, update and request CHF to stop using your personal data for the above purposes by notifying the office manager with email to <a href="mailto:info@chihengfoundation.com">info@chihengfoundation.com</a> or by mail to G.P.O. Box 3923, Central, HK. Please also read our Privacy Policy at <a href="https://chfaidsorphans.com/privacy-policy">https://chfaidsorphans.com/privacy-policy</a> for more details.</p> </div>	<p>b) for non-donation related purposes</p> <div style="background-color: #e0e0e0; padding: 10px; border: 1px solid #ccc;"> <p>Personal Information Collection Statement: CHF may use your contact information to communicate with you for newsletters, marketing materials and update of our services and fundraising activities through direct mailing, email, telephone etc. We will not sell and/or provide your personal data to any third party other than our staff, appointed volunteers and institutions who are necessary for these functions.</p> <p>The provision of personal data is purely voluntary, however, our services may be delayed or cannot be provided if data is insufficient. You have the right to access, update and request CHF to stop using your personal data for the above purposes by notifying the office manager with email to <a href="mailto:info@chihengfoundation.com">info@chihengfoundation.com</a> or by mail to G.P.O. Box 3923, Central, HK. Please also read our Privacy Policy at <a href="https://chfaidsorphans.com/privacy-policy">https://chfaidsorphans.com/privacy-policy</a> for more details.</p> </div>
<p>Exhibit 5 (example of PIC at CHF's sites / pages)</p>	<p>a) for donation purposes;</p> <ol style="list-style-type: none"> <li>1. Events -&gt; donation of Wisdom Red Packets (online &amp; pdf) : <a href="https://chfaidsorphans.com/event/donation-of-wisdom-red-packets-2021/">https://chfaidsorphans.com/event/donation-of-wisdom-red-packets-2021/</a></li> <li>2. Events -&gt; Walk for Chalk 2020 (online &amp; pdf) : <a href="https://chfaidsorphans.com/event/wfc-2020-nettour/">https://chfaidsorphans.com/event/wfc-2020-nettour/</a></li> <li>3. Support Us -&gt; Donate : <a href="https://chfaidsorphans.com/donate/">https://chfaidsorphans.com/donate/</a></li> <li>4. Support Us -&gt; Donation Forms <ul style="list-style-type: none"> <li>• Monthly Donation by Credit Card (online &amp; pdf) : <a href="https://chfaidsorphans.com/donate/#toggle-id-1">https://chfaidsorphans.com/donate/#toggle-id-1</a></li> <li>• Monthly Donation by Bank AutoPay (pdf) : <a href="https://chfaidsorphans.com/donate/#toggle-id-2">https://chfaidsorphans.com/donate/#toggle-id-2</a></li> <li>• About Receipt -&gt; General Donation Form (pdf) : <a href="https://chfaidsorphans.com/donate/">https://chfaidsorphans.com/donate/</a></li> </ul> </li> </ol>	<p>b) for non-donation related purposes</p> <ol style="list-style-type: none"> <li>1. Home -&gt; Newsletter Subscription Form : <a href="https://chfaidsorphans.com/">https://chfaidsorphans.com/</a></li> <li>2. Contact Us -&gt; Contact Form : <a href="https://chfaidsorphans.com/contact/">https://chfaidsorphans.com/contact/</a></li> <li>3. Support Us -&gt; How you can Help -&gt; Volunteer Registration Form (online &amp; pdf) : <a href="https://chfaidsorphans.com/how-you-can-help/">https://chfaidsorphans.com/how-you-can-help/</a></li> <li>4. Support Us -&gt; How you can Help -&gt; Intern Application Form (online &amp; pdf) : <a href="https://chfaidsorphans.com/how-you-can-help/">https://chfaidsorphans.com/how-you-can-help/</a></li> <li>5. Support Us -&gt; Spend to Give -&gt; Wilson Tech ASTM Level 3 Disposable medical mask (online form) : <a href="https://chfaidsorphans.com/spend-to-give/">https://chfaidsorphans.com/spend-to-give/</a></li> </ol>

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| <ul style="list-style-type: none"><li>• Crossed Cheque -&gt; Donation Form (pdf) :<br/><a href="https://chfaidsorphans.com/donate/#toggle-id-7">https://chfaidsorphans.com/donate/#toggle-id-7</a></li><li>• Life Insurance Policy Donation -&gt; Donation Form (pdf) :<br/><a href="https://chfaidsorphans.com/donate/#toggle-id-12">https://chfaidsorphans.com/donate/#toggle-id-12</a></li></ul> | <ol style="list-style-type: none"><li>6. Support Us -&gt; Spend to Give -&gt;Wilson Tech ASTM Level 3 Disposable medical mask (Chinese New Year Series) (online form) :<br/><a href="https://chfaidsorphans.com/spend-to-give/">https://chfaidsorphans.com/spend-to-give/</a></li><li>7. Support Us -&gt; Spend to Give -&gt; ZOONO Lasting Sanitizer Spraying Service (online form) :<br/><a href="https://chfaidsorphans.com/spend-to-give/">https://chfaidsorphans.com/spend-to-give/</a></li></ol> |
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