



Privacy Policy

Amicis Sinfonia Limited ("Amicis Sinfonia", "we", "our", or "us") is committed to safeguarding the privacy of our participants, schools and business partners. This Privacy Policy explains how we collect, use, store, and share personal data in compliance with applicable privacy laws in Hong Kong, including the **Personal Data (Privacy) Ordinance (Cap. 486)** ("PDPO").

This Privacy Policy applies to all personal data collected by Amicis Sinfonia in relation to our activities.

1. Personal Data We Collect

"Personal Data" refers to any information that can identify you as an individual. This may include:

- **Contact Information:** Name, email address, phone number, postal address.
- **Demographic Data:** Date of birth, nationality, and school or company name.
- **Financial Data:** Credit/debit card details or bank account information.
- **Technical Data:** IP address, device information, and cookies.
- **Preferences:** Musical interests, dietary or travel preferences (e.g., for tours).
- **Sensitive Data (if necessary):** Medical conditions (e.g., allergies, special needs).

2. How We Collect Personal Data

We collect Personal Data in the following ways:

a) Directly from You

- When you register for our programs, performances, or tours.
- When you communicate with us via phone, email, or in person.
- When you complete surveys or provide feedback.

b) Through Online Interactions

- When you visit our website or social media pages.
- Through cookies and similar technologies for tracking website activity (see our Cookie Policy for more details).

c) From Third Parties

- **Schools and Institutions:** Personal Data provided by schools for students participating in our programs or workshops.
- **Service Providers:** Data from travel agencies, accommodation providers, or production partners for managing tours and events.



3. How We Use Personal Data

We process your Personal Data for the following purposes:

a) To Provide Our Services

- Organizing orchestral performances, production services for schools, and international tours.
- Managing ticketing, travel arrangements, and accommodations.
- Ensuring participants' safety and well-being during tours or events (e.g., catering to medical or dietary needs).

b) For Communication

- Sending updates about rehearsals, tours, or activities.
- Responding to inquiries or requests.
- Sending newsletters, event invitations, or promotional materials (with your consent).

c) For Legal and Administrative Purposes

- Managing payments and financial transactions.
- Complying with legal obligations or responding to regulatory requests.
- Maintaining records for accounting, auditing, and reporting purposes.

4. Sharing Personal Data

We may share your Personal Data with:

a) Service Providers and Partners

- Travel agencies, accommodation providers, or production partners for logistical arrangements.
- Schools that engage us for production services or student participation in performances.

b) Regulatory Authorities

- To comply with legal obligations or respond to government requests.

c) International Transfers

For international tours or performances, your Personal Data may be transferred outside Hong Kong. We will ensure that such transfers comply with applicable data protection laws.

5. Legal Basis for Processing Personal Data

We process your Personal Data based on the following:

- **Contractual Necessity:** To fulfil our obligations to you (e.g., organizing tours or performances).
- **Legal Obligations:** To comply with applicable laws or regulations in Hong Kong or abroad.
- **Consent:** For processing sensitive data (e.g., medical conditions) or sending marketing communications.
- **Legitimate Interest:** For purposes such as improving our services, promoting events, or maintaining relationships with schools and participants.



6. Your Rights Under Hong Kong Law

Under the PDPO, you have the following rights:

- **Access:** Request a copy of the Personal Data we hold about you.
- **Correction:** Request corrections to any inaccurate or incomplete data.
- **Withdrawal of Consent:** Withdraw your consent for marketing communications.
- **Opt-out:** Opt out of certain data processing activities, such as direct marketing.

7. Data Retention

We will retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected or as required by law. For example:

- Participant information for tours or performances may be kept for up to 7 years for legal and administrative purposes.
- Marketing data may be retained until you withdraw your consent, but no longer than 10 years after your last engagement with us.

8. Data Security

We implement appropriate technical and organizational measures to protect your Personal Data against unauthorized access, loss, or misuse.

9. Sensitive Data

We only collect sensitive Personal Data (e.g., medical conditions) when necessary, such as to ensure your safety during tours or performances. This data will always be processed with your explicit consent and handled securely.

10. Children's Privacy

If you are under the age of 18, please review this policy with your parent or guardian to ensure you both understand it. If we learn that we have collected Personal Data from a minor without appropriate consent, we will delete it promptly.

11. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. Any changes will be posted on our website, and significant updates will be communicated directly to you where necessary.

12. Contact Us

If you have any questions about this Privacy Policy or wish to exercise your rights under the PDPO, please contact us:

Amicis Sinfonia Limited

Flat 209, 2/F, Winful Centre, 30 Shing Yip Street, Kwun Tong, Kowloon

Email: hr@amicishk.org

If you are not satisfied with our response, you may contact the **Office of the Privacy Commissioner for Personal Data (PCPD)** in Hong Kong.