

## **Privacy Policy Statement and Personal Information Collection Statement**

“Next Stop, Wellness” and its Child Websites (including “LifeFlex CUHK Chinese edition”, “E-connect CUHK Chinese edition”, “iMindTime CUHK Chinese edition”, “iSleepWell CUHK Chinese edition”, “iChooseWell CUHK Chinese edition” and “LifeFlex-LGBQ CUHK Chinese edition”, collectively referred to as “Next Stop, Wellness” ) are large-scale research projects developed and managed by The Public Mental Health Lab of the Chinese University of Hong Kong (collectively “we”, “us”, “CUHK”, “PMHLAB”). We respect the privacy of individuals (collectively referred to as “you”) and advise that a substantial proportion of data you provide us is ‘health information’ or ‘personal information’ (referred to as “personal information”). Using or registering on “Next Stop, Wellness” means you have read and agree to this “Privacy Policy Statement and Personal Information Collection Statement”, and that you have already read our Disclaimer Statement, in order to receive our treatment or service (collectively “Service”).

This Statement explains how we collect, use, store, disclose, secure, and erase any personal data which we have collected from you and your right to access such personal data, as amended from time to time and posted on our website. Minor who is under 18 years old may provide their personal data to us through volunteer registration. We are especially committed to protecting the privacy of minors who use our sites and participate in our programmes. At any time, their parents or a person appointed by a court to manage the affairs of the minor (the “Relevant Person”) can refuse to permit us to collect further personal data from their minor, and can request that we delete from our records the personal data we have collected from the minor.

To register and use “Next Stop, Wellness” you must provide accurate and truthful information, including but not limited to your name and personal email address to us. The personal email address you provided to us can be used to make contact with us, CUHK or other related institutes for research and promotion purposes. Whenever you participate in any research projects via “Next Stop, Wellness” or other Child Sites or you request us to provide any information, we can gather personal information from you. You are required to make every reasonable effort to ensure that the factual content of information you provided was accurate.

We do not share your personal information to third parties under general circumstances and endeavor to ensure that all our collection, transmission, storage and usage of personal data is carried out in compliance with the Personal Data (Privacy) Ordinance, Cap 486 of the laws of the Hong Kong Special Administrative Region (the “PDPO”). By providing your personal data to us, you are consenting to this Privacy Policy.

The term “personal data” shall have the meaning ascribed to it by the PDPO.

### **TYPES OF PERSONAL DATA COLLECTED**

Types of personal data collected by Next Stop, Wellness may include, without limitation:

1. Your personal information and contact information such as your name, email address, mailing address; and
2. Health information such as heart rate, number of steps and sleeping time, etc; and
3. Information regarding your medical history or condition, screening for suicidal ideation including self-harm and harm to others:
  - a. by asking you for such data; and

- b. by means of normal clinical diagnostic procedures.

Please note that it is mandatory for you to provide personal data or any information marked with asterisks. In the event that you do not provide such personal data, we may not be able to provide you with our products or services. Any failure to supply the necessary personal data or information requested by us may result in us being unable to process your requests or provide the services requested by you. This type of personal data is for the purpose of assessing your suitability for acceptance for therapy. The provision of such personal data is also obligatory, otherwise “Next Stop, Wellness” cannot accept you for treatment purposes.

## **COLLECTION OF PERSONAL DATA**

1. From time to time, we will collect personal data from you in connection with our provision of services.
2. We may also generate and compile information about you. Personal data and other information provided by you or generated and compiled by us about you from time to time is collectively referred to as your "Information".
3. Your Information will be processed for the specific purposes which will be given at the time we collect data or information from you. Personal data collected from you may be used by us but are not limited to:
  - a. processing, assessing and determining applications for and requests relating to the Service;
  - b. administering, maintaining, managing the Service (including enforcing rights and fulfilling obligations under the Service), and performing any function and activity related thereto (such as maintenance of online and other services);
  - c. undertaking research and for promotion purposes;
  - d. improving our site and program(s);
  - e. investigating and handling any feedback, enquiry, complaints or cases involved in our services;
  - f. assisting your access to particular resources;
  - g. communicating health outcomes (aggregate, non-identifiable data) issues or health initiatives to third parties, and in scholarly publications
  - h. managing, monitoring, planning and evaluating our services (including teaching and training purposes);
  - i. analysing trends and demographics to assist us to improve our program(s);
  - j. facilitating our internal operations, including to fulfil our legal requirements, and for quality assurance and management purposes;
  - k. sending you information and communicating with you and to providing services to you;
  - l. analysing your activity on our websites and its characteristics for statistical purposes as a mean to measure your interest in the content of “Next Stop, Wellness” and your frequency of using our website and/or to what extent did “Next Stop, Wellness” improved your wellbeing ;
  - m. analysing relevant data for research purpose based on the research projects you have signed up for or registered;
  - n. accepting your applications for participating in research projects;
  - o. managing and processing all the dealings between us;

- p. verifying your identity and the qualification of you participating in any of our research project; and
- q. making disclosure when required by any law, court order, direction, code or guideline applicable in or outside Hong Kong;
- r. preventing, detecting or investigating suspicious, fraudulent or illegal activities; and
- s. any other directly related purposes pertaining to any of the above, or other purposes agreed by a data subject.

## **USE OF COOKIES**

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access Next Stop, Wellness's website. The websites record and logs the following information for statistical purposes:

- the user's server address;
- the users top level domain name;
- the date and time of access to the site;
- pages accessed and documents downloaded;
- the previous site visited;
- the type of browser software in use.

Cookies are used across most of the websites on the internet and stores the information of you visiting our website. Our websites will not gather your other browsing data or other data saved in your computer's hard disk. A Cookie does not identify you personally but it does identify your computer. If you want to disallow the use of cookies, you can do so on your own web browser. If you disable cookies, you acknowledge that you may not be able to use some of the functionality of our website.

## **RETENTION OF PERSONAL DATA**

1. Personal data and health information will only be retained for three years, as long as it is necessary to fulfill the original or directly related purpose for which it was collected, unless the personal data is also retained to satisfy any applicable statutory or contractual obligations.
2. Personal data are purged from our electronic, manual, and other filing systems after 3 years based on the above criteria and our internal procedures.

## **SECURITY OF PERSONAL DATA**

We will endeavour to ensure that any personal data held by CUHK is stored in a secure and safe place. We take all possible steps to protect your information which we hold (including your personal information or health information) from misuse, loss, unauthorised access, modification or disclosure. We use professional and industry standards for the security and protection of information collected. For example, information submitted within the “Next Stop, Wellness” is secured using a 256-bit encryption Secure Sockets Layer and Transport Layer Security (SSL/TLS) software and protected by encryption and firewall technology.

All personal data which we collect is kept confidential to the best of our ability. You will appreciate however, that we cannot guarantee the security of transmission perfectly. To ensure the security and the safety of “Next Stop, Wellness”, we will need your cooperation as well, including comply with the followings:

- You will not upload virus or any other malicious application; and
- You will not engage in any malicious acts or any action that will affect the operation of “Next Stop, Wellness” such as collecting others’ log in credentials or attempting to enter other users’ accounts.

#### **DISCLOSURE OF PERSONAL DATA**

1. Your Information will not be disclosed to any third party except as provided herein, as notified to you at the time of collection, or with your prior consent. We do not rent, trade or sell your Information for commercial purposes.
2. For the personal data received by us during the course of our service, only persons involved in the handling of the relevant services or application for services will have access to the relevant personal data.
3. Except with your prior consent or as required by law, we will not transfer or disclose your Information to any third party except that we may transfer or disclose your Information in or outside Hong Kong as stated below:
  - a. any personnel, agent, adviser, auditor, contractor or service provider who provides services or advice to us in connection with our operations to enable us to provide, or assist us in providing, the services you have requested;
  - b. any person under a duty of confidentiality to us;
  - c. professional advisers acting as processors who provide services to “Next Stop, Wellness” and employees;
  - d. any person to whom we are required to make disclosure under any law, court order, direction, code or guideline applicable in or outside Hong Kong; and
  - e. any person as is necessary for us to bring a legal action or defend any legal action in relation to you.
4. As we have no control over the acts of any third party that is not our agent or service provider (e.g. any governmental agency to whom we are required to disclose Your Information), the privacy protection stated in this Policy ceases to apply to any information which has been disclosed to such a third party in accordance with this Policy.
5. At times it may be necessary for us to transfer certain personal data to places outside of the Hong Kong in order to carry out the purposes, or directly related purposes, for which the personal data were collected. Where such a transfer is performed, it will be done in compliance with the requirements of the Ordinance.

## **LINKS**

“Next Stop, Wellness” may contain links to other sites and pages. By activating a link, such as for example by clicking on the banner of an advertiser, you leave our website and we do not exercise control over any personal data or any other information you give to any other entity after you have left our website. Access to and use of such other websites is at your own risk.

## **THE RIGHT TO ACCESS AND CORRECT YOUR DATA**

According to the Personal Data (Privacy) Ordinance, you have the right to access and correct any personal information you provided to us. Should you wish to access or correct your personal data held by us, you may contact us by writing to the following address:

Room 304b  
3/F, Public Mental Health Laboratory  
Wong Foo Yuan Building  
Chung Chi College  
The Chinese University of Hong Kong  
Sha Tin  
New Territories  
Hong Kong  
For the attention of: Public Mental Health Laboratory

or email us at [nextstopwellness@cuhk.edu.hk](mailto:nextstopwellness@cuhk.edu.hk)

All reasonable efforts are made to ensure that any personal data held by the CUHK is stored in a secure and safe place. If your personal information changes, or if you no longer desire a “Next Stop, Wellness” program account, you have the right to correct, update, amend, or ‘withdraw’ from a “Next Stop, Wellness” program by making the change on your My Profile page in order to prevent us from further gathering and using your personal information. However, the personal information you have provided to us before deleting your account will be stored in our system, unless you clearly state that you would like us to delete your personal information stored in our system in the data access request form (<http://www.pcpd.org.hk/english/publications/files/Dforme.pdf>) sending to “PMHLAB” or emailing to [nextstopwellness@cuhk.edu.hk](mailto:nextstopwellness@cuhk.edu.hk). According to the Personal Data (Privacy) Ordinance, we have the right to charge costs which are directly related to and necessary for the processing of any personal data access request. After receiving your request, we have the right to request you to provide your personal information such as your name, email address and login credentials in order to verify your identity before we access, modify or remove any of your personal information from our system. We will then see whether the information matches with the personal information of the account you requested to modify/remove. Once we have confirmed your identity, we will proceed with your request. If we cannot verify your identity, meaning the personal information you provided us does not match with the personal information of the account you requested to modify/remove, we will refuse your data access request by writing to you via email, stating that we cannot proceed with your request because the information you provided does not match with the personal information stored in our system. A log entry containing the particulars of the reasons for the refusal of the data access request will also be kept for four years. Please note that if you want to remove your any other information provided to other institute(s) that is not handled by us (e.g. other information you provided to relevant research activities), you will need to contact the research team(s) or

institute(s) responsible for the project in order to have your personal information managed (and removed).

### **UNSUBSCRIBING FROM COMMERCIAL ELECTRONIC MESSAGES**

If you do not want to receive any information related to the research projects organised by us and/or other research teams and institutes, you can make an “unsubscribe request” to us by writing us a letter or email us at [nextstopwellness@cuhk.edu.hk](mailto:nextstopwellness@cuhk.edu.hk). Please also leave your registered name and email address you provided to us previously, and the contact you wish to use for contacting us.

“Next Stop, Wellness” reserves the right to update this Privacy Policy Statement at any time and will make available an updated Personal Information Collection Statement on our website so that you are always aware of what information we collect, how we use the information and under what circumstances the information is disclosed. Any such change, update or modification will be effective immediately upon posting.

Last Updated: 26<sup>th</sup> May, 2022