

## MDS 360® Platform Data Privacy Policy

The MDS 360® Platform is owned by Management Development Services Ltd. (MDS). This Data Privacy Policy tells you about MDS's policy and practice for the collection and storage of your data through the MDS 360® platform.

Before you access and use the MDS 360® Platform, you will be asked to provide your authorisation and consent by agreeing to the terms and conditions of this MDS Data Privacy Policy and consenting to the collection and processing of your information.

The collection, use, processing, storage, transfer and disclosure of your Personal Information will be governed by the details below. MDS is committed to compliance with all relevant country-specific data privacy laws, including EU Standard Contractual Clauses, model contracts / transfer agreements, privacy statements and policies, and country-specific filings if applicable. This Data Privacy Policy covers the MDS 360® Platform.

### Collection of Your Personal Information

Personal information ("Personal Information") is data that can be used to identify, either directly or indirectly, an individual to whom the information applies. The information that we may collect from you includes your name, email address, and data you provide when completing the MDS 360® questionnaire.

MDS will not collect any Personal Information about you apart from this.

### Use of Your Personal Information to Complete MDS 360® Questionnaires

When you complete the MDS 360® questionnaire all information is collected, stored and transmitted by MDS through <http://www.mds360.com.hk> our MDS 360® Platform. The platform is a restricted access site that allows you to manage and complete questionnaires. Data collected via the MDS 360® platform is used to create feedback reports for the purpose of individual and organisational development. Only MDS will have access to the data you provide in your questionnaire.

### Data Controllorship

In the context of MDS 360® Questionnaires, MDS acts as a **data processor** for the Personal Information we process.

### How We Receive Personal Information

We will receive your Personal Information through our MDS 360® Platform to:

- create and complete a self questionnaire
- invite an observer to complete an observer questionnaire
- generate an MDS 360® report

### Purposes of Processing

We may process your Personal Information for the purposes of:

- providing feedback reports for the purpose of individual and organizational development.

### Data Retention

Data processed through our MDS 360® Platform is retained for 12 months after which time it is deleted from our database. However, we will always respect your request that we delete your Personal Data at an earlier date.

### Data Ownership

MDS defines the Owner of the data as follows:

1. Each person who completes a questionnaire is considered the Owner of those responses and has the right to request, at any time, that those responses be removed from the MDS 360® Platform.
2. Each person or organization that is the focus of a given report from the MDS 360® Platform has the right to direct access to copies of those reports.

**No Sharing of Information**

MDS is committed to maintaining a healthy relationship with our customers and values the information provided on the MDS 360® Platform. MDS does not share customer information with third parties for purposes outside the scope of the MDS 360® reports. We will never share, sell, or rent your personal information to third parties for promotional use.

However, MDS may be required to disclose an individual’s personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

**Cookies and Other Technologies**

The MDS 360® Platform may use certain automatic data collection technologies such as cookies to collect data, including personal information, about you while you use the platform. A cookie is a piece of information that is stored on your computer’s hard drive by your web browser. When you visit <http://www.mds360.com.hk> our server recognizes the cookie, giving us information about your last visit to the platform. Many browsers accept cookies automatically, but you can adjust the settings in your browser to disable automatic acceptance of cookies. If you choose not to use cookies, you may experience limited functionality of our platform.

**Retention of Personal Information**

Your Personal Information will be stored only for the time period necessary to fulfill the purposes outlined in this Data Privacy Policy unless otherwise required or permitted by law.

**Data Security**

MDS takes the security of Personal Information seriously. To protect your Personal Information against accidental or unlawful destruction, loss or alteration, MDS uses technical and organizational security measures to prevent any unauthorized disclosure or access. We require you to enter a password to access your MDS 360® information.

**Retention**

MDS keeps your personal information for as long as required to fulfill the purposes for which it was collected, or as permitted by law.

**Access**

MDS acknowledges that EU individuals have the right to access the personal information that we maintain about them. MDS provides ways for you to access your personal information, as required by law, so you can correct inaccuracies if necessary.

**Enforcement**

MDS regularly reviews how we are meeting these privacy promises, and we provide an independent way to resolve complaints about our privacy practices. MDS commits to cooperate with data protection authorities (DPAs) and complies with the advice given by such authorities.

**Right to be Forgotten**

MDS is committed to taking all reasonable steps to comply with a request to be forgotten.

**Contact Us**

MDS is committed to responding to reasonable requests to review any of your Personal Information that we may have and to amend, correct, or delete any inaccuracies. To have your information amended, corrected, or deleted, or if you have any questions that were not answered in this Data Privacy Policy, you can contact us at Management Development Services Ltd. [mds360@mdshongkong.com](mailto:mds360@mdshongkong.com)

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