

Hong Kong Access Federation (HKAF) Privacy Policy

Version 1.1

1. Document Control

1.1 Document Status

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1.2 Document History

Version Number	Revision Date	Summary of Changes	Authored By	Approved By
1.0	01-Jul-2017	Official release	AFWG	JUCC Steering Committee
1.1	11-Oct-2017	Amendments of terms in p.3, 6 & 7	HKAF Operator Team	JUCC Steering Committee

2. Introduction

The Hong Kong Access Federation (HKAF) recognizes and respects the privacy interests of its users. This policy is intended to help you understand how HKAF manages personal information. Whenever you give us personal information, you are consenting to its collection and use in accordance with this policy.

HKAF is owned and managed by Joint Universities Computer Centre Ltd. (JUCC), but this policy - and not any of JUCC's privacy policies – applies to HKAF. It may be necessary to update this policy from time to time. The latest version will be made available on the HKAF website at <https://www.hkaf.edu.hk/privacy-policy>.

3. What This Policy Covers?

This policy applies to the following systems and services:

- **HKAF services:** any service provided directly by HKAF;
- **HKAF e-mail:** e-mail between HKAF Operator Team members; e-mail involving HKAF-related aliases (such as hkaf-admin@jucc.edu.hk); and HKAF mailing lists (such as hkaf-member-mgt-contact@jucc.edu.hk);
- **HKAF's web sites:** any web site administered by HKAF or used by HKAF to provide information to the HKAF Community, including <https://www.hkaf.edu.hk>.

4. Your Personal Information And HKAF

HKAF provides a trust framework (including policies and technologies) which assists HKAF Members who act as Home Organizations (e.g. education or research institutions) to authenticate their End Users in their Identity Providers to access the services or applications of the Service Providers of Members who act as Service Provider Organizations (e.g. providers of online education or research services or applications).

The main circumstance in which HKAF will collect, store, use or disclose personal information about you is where you act as an account administrator or other representative of a HKAF Member and your personal information is provided to HKAF by you or the Member. Further details regarding the above collection, storage, use or disclosure of personal information by HKAF is set out below.

In most instances, personal information that is collected, stored, used and disclosed as a result of an individual being authenticated via the HKAF framework will be collected, stored, used and disclosed by HKAF Members, rather than by HKAF.

For information about the privacy policies and procedures of the HKAF Members, please contact the relevant Members.

5. What Personal Information Do We Collect?

Some HKAF services collect data from HKAF Member executives, administrators, delegates and other roles used in collaboratively operating the services. This information is limited to operational information used to uniquely identify, contact, interoperate with and handle service management operations both between HKAF and its members, and between members. This operational information could include name, job title, phone number, and email address. If a Member exports metadata to interfederation service(s) such as eduGAIN, a limited subset of this operational data associated with that /those systems may be exported to participants of other federations or services participating in interfederation.

The identity data collected by HKAF Members and used in transactions which are federated via the Federation is not collected by HKAF except where specifically released to HKAF by the Members for purposes of interacting with applications owned and operated by HKAF. This information is limited in scope (e.g., email address, name, user ID). The section below titled 'Your Personal Information and HKAF Members' explains more about this.

When you visit a HKAF website, our web server software automatically collects certain information. Specifically, our web servers typically log the requesting IP address, the page requested, the time of the request, referrer information, information about the browser being used, your computer's operating system, and the status of the request (for example, if a page does not exist, a 404 error code will be returned).

Like many websites, HKAF uses cookies and similar technologies to make our website work best for our users. A cookie is a text file that is sent from a web server to your browser and may be stored by your browser or on your computer's hard drive. The text file is then sent back to the server each time the browser requests a page from that server. This enables the web server to identify and track the web browser. Cookies cannot read data off your hard disk and will not damage your system. You can set your browser to refuse any cookie or to alert you when a cookie is being sent. If you refuse cookies, some portions of our website may not function optimally.

With respect to "do not track" requests, HKAF does not support such requests and continues to collect information as described in this policy.

When you make an enquiry or sign up for a HKAF mailing list, you may be asked to provide some personal information such as your name, job title, address, telephone number and email address. This enables HKAF to respond to your enquiry or to provide you with information about HKAF and its activities. Mailing list content, including some user information, may be routinely archived by HKAF and made available to present and future list subscribers or to the public, depending upon the list.

HKAF holds personal information in electronic forms in secure databases accessible only by authorized staff. Personal information may also be held by HKAF in hard copy, for example at its secure premises. Personal information may also, in certain circumstances, be held on behalf of HKAF in hard copy or electronic forms by its service providers (such as offsite document storage providers or electronic data storage providers).

6. Why We Collect This Information?

Much of the information that HKAF collects enables us to operate the services provided by HKAF. For example, we collect information from individuals who have been designated with official roles on behalf

of their organizations in order for those specified individuals to carry out their duties in a trusted manner. Similarly, we collect information when you sign up for an HKAF mailing list to enable us to provide you with content you requested.

With respect to information automatically collected when users browse our websites, HKAF collects this information to optimize the design of our websites and the user experience, to identify website errors, and for other operational purposes.

7. How Do We Use Your Personal Information?

If you or your Home Organization have provided any personal information to us, this personal information is collected, held, used and disclosed by HKAF for the purpose of operating a Federation (including providing an authentication framework), to help us respond to enquiries you have made, or to tell you about HKAF activities and about services available via the HKAF.

If you use federated authentication to access a HKAF service such as the Federation Registry, the personal information that is provided about you by the Identity Provider of your Home Organization is collected, held, used and disclosed by HKAF for the following purposes:

- To authorize your access to the service you have requested;
- To record user access of our services. Records are retained in order to facilitate traceability of End Users via the Identity Provider. This might be necessary, for example, to discontinue access to a service in the event of misuse;
- To personalize the service for you;
- To generate aggregated anonymized usage statistics for service development or for other purposes agreed in writing from time to time with the Home Organization;

We will retain your personal information as long as necessary for the above purposes or to comply with relevant laws. We will not use your personal information for other purposes without your prior consent unless we are obliged to do so by law.

Whenever and wherever we collect, process or use personal information, we take steps to ensure that it is treated securely and in accordance with this policy.

8. How Do We Disclose Your Personal Information?

If you use federated authentication to access a HKAF service such as Federation Registry, we may disclose your personal information to a Service Provider Organization to authorize your access to the service you have requested and otherwise provide our services and operate our authentication framework.

We may also disclose your personal information to third party service providers appointed by HKAF, such a hosting or email service providers.

We will not otherwise disclose your personal information to any third party without your prior consent

unless we are obliged to do so by law, or where we need to do so in order to carry out the successful operation of a Federation.

Some of the parties we disclose your personal information may be located overseas (for example if we disclose your personal information to a Service Provider located overseas to authorize your access to the service). It is not possible to specify the countries in which these overseas recipients are likely to be located.

Cookies

We may use cookies. You can reset your browser so as to refuse any cookie or to alert you to when a cookie is being sent. If you refuse cookies, some pages or features may not function.

9. Your Personal Information And HKAF Members

Most of the time when you access the service of a Service Provider via the HKAF framework, the service is provided not by HKAF but by a HKAF Member who acts as the Service Provider Organization. Within this framework, when you, as an end user, log in to a Service Provider through the Identity Provider of your Home Organization (usually your university or institution), the Identity Provider passes some information about you to the Service Provider in the form of user attributes. The Service Provider uses the attributes for authorization and for providing a better service to you as the end user and HKAF does not normally collect, store, use or disclose any personal information regarding you,

The management of your personal information in these transactions is the responsibility of your Home Organization that releases your attributes and the Service Provider Organization that receives them. Where this information is incorrect you should contact your Home Organization directly and seek their assistance. All HKAF Members (no matter whether acting as a Home Organization or a Service Provider Organization) are bound by the HKAF Federation Policy which include requirements to comply with the Hong Kong Personal Data (Privacy) Ordinance. The Federation Policy and associated documents include rules and principles on the conditions under which user attributes may be released and on the ways they may be used.

10. Access To Personal Information And Opportunity To Update Information

HKAF allows Members to update operational information for each service they participate in. Users may email hkaf-admin@jucc.edu.hk with questions about how to update their personal information with respect to a specific HKAF service.

11. Notice For Updates And Changes To Policy

HKAF will update this policy from time to time, and the most current version will always be posted at <https://www.hkaf.edu.hk/privacy-policy>. We encourage you to review this statement regularly.

12. Who To Contact If You Have Questions?

If you have any questions about the HKAF Privacy Policy, please contact us via email at hkaf-admin@jucc.edu.hk.