

**Privacy Policy Statement of Shanghai Commercial Bank Limited (the “Bank”)  
and its Subsidiaries (collectively the “Group”)**

The purpose of this Statement is to set out the policies and practices of the Group’s commitment to protecting personal data privacy in accordance with the provisions of the Personal Data (Privacy) Ordinance (“Ordinance”).

In this Statement, “Bank Group Company” means any subsidiary of the Bank, any direct or indirect holding company of the Bank, or any subsidiary, affiliate or associated entity of any such holding company.

## **1. Kinds of Personal Data Held**

There are two broad categories of personal data held by the Group:

### **1.1 Personal Data of Customers**

Customer records, which are necessary for customers to supply to the Group in connection with the opening or continuation of accounts, establishment or continuation of banking facilities, provision of banking or other financial services and/or tenancy and property management services.

### **1.2 Personal Data of Employees**

Personnel records, which include personal details, job particulars, details of remuneration and benefits, performance appraisals, disciplinary matters and other relevant information relating to job applicants, subcontract staff, employees, former employees and their family members of the Group for performing human resources management functions.

## **2. Main Purposes of Keeping Personal Data**

### **2.1 In relation to Customers:**

The purposes for which data relating to a customer may be used are as follows: -

- (i) considering and assessing the Customer’s application for the products and services of the Group or any Bank Group Company;
- (ii) the processing of applications for services and credit facilities;
- (iii) the daily operation of the services and credit facilities provided to Customers, including for credit assessment, statistical or behaviour analysis, or creating and maintaining the credit scoring models of the Group or any Bank Group Company;
- (iv) provision of reference;
- (v) conducting credit and status checks (including without limitations upon applications for consumer credit and periodic or special reviews of such credit);
- (vi) assisting other financial institutions, card issuers or credit reference agencies to conduct credit checks and collect debts;
- (vii) maintaining application and credit history of Customers for internal reference, and ensuring ongoing credit worthiness of Customers;
- (viii) researching, designing financial services or related products for Customers’ use;
- (ix) marketing services, products and other subjects (in respect of which the Group may or may not be remunerated);
- (x) determining the amount of indebtedness owed to or by Customers;

- (xi) collection of amounts outstanding from Customers and those providing security for Customers' obligations;
- (xii) complying with the obligations, requirements or arrangements for disclosing and using data that apply to the Bank or any of its branches and offices or any Bank Group Company or that it is expected to comply according to:
  - (a) any law binding or applying to it within or outside the Hong Kong Special Administrative Region ("Hong Kong") existing currently and in the future (e.g. the Inland Revenue Ordinance and its provisions including those concerning automatic exchange of financial account information);
  - (b) any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside Hong Kong existing currently and in the future (e.g. guidelines or guidance given or issued by the Inland Revenue Department including those concerning automatic exchange of financial account information);
  - (c) any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers that is assumed by or imposed on the Bank or any of its branches and offices or any Bank Group Company by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, law enforcement or other authority, or self-regulatory or industry bodies or associations;
- (xiii) complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the Group or any Bank Group Company and/or any other use of data and information in accordance with any group-wide programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
- (xiv) enabling an actual or proposed assignee of the Group or any Bank Group Company, or participant or sub-participant of the rights of the Group or any Bank Group Company in respect of the Customer to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation;
- (xv) the performance of procedures for comparing (whether by manual or automated means) the Customer's data with other information supplied by the Customers (for whatever purposes), including without limitation, procedures undertaken for the purpose of taking adverse action against Customers;
- (xvi) giving effect to the Customer's orders relating to transactions or otherwise, and carrying out instructions of the Customer;
- (xvii) providing services in connection with the accounts, whether the services are provided by or through, the Group, any Bank Group Company or any other person;
- (xviii) exchanging information with merchants accepting credit cards issued by the Group and organizations with whom the Group provides affinity/co-branded/private label credit card services; and
- (xix) all other incidental and associated purposes relating to any of the above.

## **2.2 In relation to Employees:**

The purposes for which data relating to job applicants, subcontract staff and employees may be used

are as follows:

- (i) assessing the job applicant's/subcontract staff's /employee's suitability to assume the job duties of the position concerned, or any other positions;
- (ii) determining and reviewing salaries, bonuses and other remuneration and benefits;
- (iii) consideration for appraisals, promotion, training, secondment, assignments or transfer;
- (iv) consideration of eligibility for and administration of staff loans and other benefits and entitlements;
- (v) providing employee references and for background screening /vetting;
- (vi) conducting assessments and investigations pursuant to any laws, regulations or orders binding on the Group or internal guidelines of the Group and registering with regulatory authorities or institutions for purposes associated with the job requirements or duties;
- (vii) monitoring compliance with any laws, regulations or orders binding on the Group or internal guidelines of the Group;
- (viii) meeting obligations, requirements or arrangements of any member of the Bank Group Company to comply with:
  - (a) any laws, regulations or orders within or outside Hong Kong existing currently or in the future;
  - (b) any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside Hong Kong existing currently or in the future;
  - (c) any present or future contractual or other commitment with local or foreign legal, regulatory, judicial, administrative, public or law enforcement body, or governmental, tax, revenue, monetary, securities or futures exchange, court, central bank or other authorities, or self-regulatory or industry bodies or associations of financial service providers or any of their agents with jurisdiction over all or any part of the Bank Group Company; and
- (ix) all other incidental and associated purposes relating to any of the above .

### **3. Collection of Personal Data**

- 3.1. In relation to the collection of personal data, the Group will provide the individuals with a copy of the [Circular to Customers and Other Individuals relating to the Personal Data \(Privacy\) Ordinance](#) (“Circular”) and/or the Personal Information Collection Statement (Notice to Job Applicants/Subcontract Staff /Employees relating to the Personal Data (Privacy) Ordinance) (the “PICS”) (as and where applicable), informing them the purpose of collection, classes of persons to whom the data may be transferred, their rights to access and correct the data and other relevant information.
- 3.2. In relation to the collection of personal data when you visit the Group’s website, please refer to the [Internet Privacy Policy Statement](#) of the Group for details.

### **4. Retention of Personal Data**

- 4.1 The personal data will not be kept longer than necessary for the fulfillment of the purposes for which the personal data are or are to be used at the time of the collection and for compliance with the legal, regulatory and accounting requirements from time to time.

## **5. Disclosure of Personal Data**

5.1 The personal data will not be disclosed to other parties unless such disclosure is made in accordance with the Circular and/or the PICS and/or is permitted or required by any law binding on the Group.

## **6. Security of Personal Data**

6.1 The Group commits to protecting the personal data by restricting access by authorized personnel, providing secure data storage facilities and incorporating security measures into equipment in which data is held. Encryption technology is employed for sensitive data transmission.

6.2 If the Group engages data processors to handle or process personal data on the Group's behalf (whether within or outside Hong Kong), the Group will adopt contractual or other means to prevent unauthorized or accidental access, processing, erasure, loss or use of the data transferred to the data processors for processing.

## **7. Revision of Privacy Policy Statement**

7.1 This Statement is subject to review and amendment from time to time. Please approach the Group and/or visit the Group's website regularly for the Group's latest Statement.

## **8. Data Access Requests and Data Correction Requests**

8.1 The Group will comply with and process all data access and correction requests in accordance with the provisions of the Ordinance.

8.2 The Group may impose a reasonable fee for complying with a data access request in accordance with the Ordinance.

8.3 Data access requests and data correction requests to the Group may be addressed to the Data Protection Officer.

## **9. Contact Details of the Data Protection Officer**

9.1 Request for access to personal data or correction of personal data or for information regarding policies and practices on personal data and kinds of data held should be addressed to:

The Data Protection Officer  
Shanghai Commercial Bank Limited  
GPO Box 139 Hong Kong  
Fax: (852) 2525 2336

## **10. Miscellaneous**

10.1 If there is any inconsistency between the English version and the Chinese version of this Statement, the English version shall prevail.