

## 私隱政策聲明

訂立本私隱政策聲明的目的是按個人資料(私隱)條例 (下稱「條例」) 的條款確立中銀香港(控股)有限公司及其附屬公司，包括中國銀行(香港)有限公司、中銀信用卡(國際)有限公司、中銀集團人壽保險有限公司、寶生證券及期貨有限公司及中銀香港資產管理有限公司 (各稱「本公司」，如該公司仍屬中銀香港(控股)有限公司之附屬公司及不論該公司名稱有任何改變) 對於致力保障個人資料私隱的政策及實務。本公司非常重視個人私隱並努力維護本公司將會收集得到的個人資料的保安及保密以達致鞏固本公司與「資料當事人」、「僱員」、「使用者」及「其他個別人士」 (按以下釋義)之間的信任。

「資料當事人」一詞，不論於本聲明何處提及，包括以下為個人的類別：

- a. 本公司提供的財務、保險、信用卡、證券、商品、投資、銀行及相關服務和產品及授信的申請人或客戶、被授權人、受保人、保單持有人、受益人及其他用戶；
- b. 基於對本公司負有的責任而出任擔保人、保證人及提供抵押、擔保或任何形式的支持的人士；及
- c. 任何公司申請人及資料當事人/用戶的董事、股東、高級職員及經理。

「僱員」一詞，不論於本聲明何處提及，包括本公司的僱員及/或申請本公司任何職位的申請人。

「使用者」一詞，不論於本聲明何處提及，包括本公司網站的訪客及/或使用，或當訪客及/或使用任何電子裝置包括但不限於電腦及手提電話（「電子裝置」）與本公司聯絡。

「其他個別人士」一詞，不論於本聲明何處提及，包括本公司的供應商、承建商、服務供應商、業務夥伴、業主、租客、講座參加者、訪客、其他合約締約方及以上各方之僱員(如適用)。

就本聲明而言，「本集團」指本公司及其控股公司、分行、附屬公司、代表辦事處及附屬成員，不論其所在地。附屬成員包括本公司的控股公司之分行、附屬公司、代表辦事處及附屬成員，不論其所在地。

本公司各方在本聲明下的權利和責任為各別的而非共同的。本公司一方毋須為本公司另一方之行為或不作為負責。

### 持有個人資料的種類

本公司持有的個人資料主要分為三大類。他們分別由以下各項所含個人資料組成：

1. 關於資料當事人記錄，資料當事人需不時向本公司提供有關資料：
  - a. 在開立或延續賬戶、建立或延續銀行授信或提供財務、保險、信用卡、證券、商品、投資、銀行及相關服務和產品和授信；
  - b. 在資料當事人與本公司延續正常業務往來期間，例如，當資料當事人簽發支票、存款或透過本公司發出的或提供的信用卡進行交易或在一般情況下以口頭或書面形式與本公司溝通時。
2. 關於僱員記錄，包括但不限於僱員姓名、地址、電郵地址、聯絡電話號碼、教育背景、履歷及家屬的相關個人資料。
3. 關於其他個別人士記錄，包括但不限於本公司的供應商、承建商、服務供應商、業務夥伴、業主、

租客、講座參加者、訪客、其他合約締約方及以上各方之僱員（如適用）的姓名、地址、電郵地址、聯絡電話號碼及其他載有個人資料的運作及行政方面的檔案。

## 保存個人資料的目的

### 1. 關於資料當事人：

- a. 資料當事人在開立或延續賬戶、建立或延續銀行授信或提供財務、保險、信用卡、證券、商品、投資、銀行及相關服務和產品及授信時，需要不時向本公司提供有關的資料。
- b. 若未能向本公司提供該等資料，可能會導致本公司無法開立或延續賬戶或建立或延續銀行授信或提供財務、保險、信用卡、證券、商品、投資、銀行及相關服務和產品及授信。
- c. 本公司會不時從各方收集或接收有關資料當事人的資料。該等資料包括但不限於在資料當事人與本公司延續正常業務往來期間，例如，當資料當事人簽發支票、存款或透過本公司發出的或提供的信用卡進行交易或在一般情況下以口頭或書面形式與本公司溝通時，從資料當事人所收集的資料，及從其他來源（例如，信貸資料服務機構）獲取資料。資料亦可能與本公司或任何本集團成員可獲取的其他資料組合或產生。

資料當事人之資料可能會用作以下用途：

- a. 評估資料當事人作為財務、保險、信用卡、證券、商品、投資、銀行及相關服務和產品及授信的實際或準申請人的優點和適合性，及/或處理及/或批核其申請、變更、續期、取消、復效及索償；
- b. 便利提供予資料當事人的服務，信貸及/或保單之日常運作；
- c. 在適當時作信貸檢查(包括但不限於在信貸申請時及定期或特定審查(通常每年進行一至多次)時)及進行核對程序(如條例所定義的)；
- d. 編制及維持本公司的評分模型；
- e. 提供信用查詢備考書；
- f. 協助其他財務機構作信用檢查及追討債務；
- g. 確保資料當事人維持可靠信用；
- h. 研發、客戶概況彙編及分類及/或設計供資料當事人使用的財務、保險、信用卡、證券、商品、投資、銀行及相關服務和產品及授信；
- i. 為推廣服務、產品及其他標的(詳見本公司的資料政策通告(下稱「資料政策通告」)的第10段)；
- j. 確定本公司對資料當事人或資料當事人對本公司的負債款額；
- k. 強制執行資料當事人應向本公司履行之責任，包括但不限於向資料當事人及為向資料當事人提供抵押的人士追討欠款；
- l. 為符合根據下述適用於本公司或其任何分行或期望本公司或其任何分行遵從的有關披露及使用資料之責任、規定或安排：
  - i. 在香港特別行政區境內或境外之已存在、現有或將來對其具約束力或適用於其的任何法律(如稅務條例及其包括有關自動交換財務賬戶資料的條文)；
  - ii. 在香港特別行政區境內或境外之已存在、現有或將來並由任何法定、監管、政府、稅務、執法或其他機構，或由金融服務提供者之自律監管或行業的團體或組織所發出或提供之任何指引或指導(如由稅務局所發出或提供包括有關自動交換財務賬戶資料的指引或指導)；
  - iii. 本公司或其任何分行因其金融、商業、營業或其他利益或活動處於或關連於相關本地或海外的法定、監管、政府、稅務、執法或其他機構或金融服務提供者之自律監管或行業團體或組織之司法管轄區而須承擔或獲施加與本地或海外之法定、監管、政府、稅務、執法或其他機構或金融服務提供者之自律監管或行業團體或組織之間的現有或將來之任何合約承諾或其他承諾；

- m. 為符合根據任何集團計劃下就遵從洗錢、恐怖份子資金籌集或其他非法活動之制裁或防止或偵測而作出中銀香港集團內資料及信息分享及/或任何其他使用資料及信息的任何責任、規定、政策、程序、措施或安排；
- n. 使本公司的實在或建議承讓人，或本公司對資料當事人的權利的參與人或附屬參與人評核意圖成為轉讓，參與或附屬參與的交易；
- o. 與資料當事人或其他人士之資料比較以進行信貸調查，資料核實或以其他方法產生或核實資料，不論有關比較是否為對該資料當事人採取不利之行動而推行；
- p. 作為維持資料當事人的信貸記錄或其他記錄，不論資料當事人與本公司是否存在任何關係，以作現在或將來參考用；及
- q. 與上述的用途有聯繫、有附帶性或有關的用途。

## 2. 關於僱員(如適用)：

僱員資料主要是用於與僱傭關係和人力資源管理相關的工作，包括但不限於本項所列的目的：

- a. 處理工作申請；
- b. 釐定及檢討薪酬、獎金及其他員工福利；
- c. 向前僱主進行推薦檢查；
- d. 考慮升遷、調任、借用；
- e. 對本公司內部細則的合規監控；
- f. 用於任何直接或間接有關本公司的合規目的及任何僱傭或法定責任；及
- g. 管理任何有關僱員退休及保險計劃的事宜及福利。

## 3.關於其他個別人士(如適用):

其他個別人士之資料可能會用作以下用途;

- a. 聘請、管理、監督及評估供應商、承建商、服務供應商、業務夥伴的業務關係及其提供服務予本公司的員工；
- b. 管理、監督及評估業主及/或租客的租務關係；
- c. 舉辦及提供本公司的講座活動；及
- d. 便利上述各項的日常運作及行政工作。

## 個人資料的收集及使用

1. 關於收集個人資料，本公司會向資料當事人提供一份「資料政策通告」的副本及/或(如適用)向僱員提供一份就有關收集僱員記錄的通知副本及/或(如適用)通知其他個別人士，述明收集資料的目的、將獲轉交資料的人士的身分類別、查閱及改正資料的權利，以及其他有關資料。

2. 關於網上收集資料及個人資料或當使用者經電子裝置與本公司聯絡，以下條款只適用於本公司所管理的網站或當使用者經電子裝置與本公司聯絡：

a. 本部份僅限於透過本公司網站、本公司的網上廣告及電子通訊所收集有關的資料。本部份並不適用於使用者離開本公司網站後，或使用者登入有本公司網上廣告的第三方網站或並非本公司運作或控制的第三方網站的連結時。

b. 使用者瀏覽本公司網站、電子回應本公司的網上廣告、經任何電子裝置與本公司通訊即表明使用者同意本公司按照本部份所述使用 **Cookies** 及使用者的資料。除非使用者同意以上所述，否則請不要繼續使用本公司網站及提供使用者的資料。

c. 本公司會經網頁伺服器日誌存錄到訪本公司網站人士之記錄 (包括：點擊日期時間、IP 地址、點擊的網頁、瀏覽器類別、裝置、操作系統、網上銀行戶口號碼 (如適用))；本公司有可能將使用者到訪的記錄 (或會結合使用者其他個人資料)用作改善網站運作、統計分析及推廣用途，本公司會按照實際需要，將有關資料保留一段適當的時間。本公司網頁伺服器日誌是預設為自動存錄使用者資料的，如使用者繼續瀏覽本公司網站，即代表使用者已確認同意本公司按上述說明存錄、使用及轉移其資料。此外，本公司可能會存錄使用者到訪本公司微信官方賬號之記錄；如有需要，本公司亦有可能將上述使用者到訪微信官方賬號之記錄傳送予中銀信用卡(國際)有限公司，作統計用途及分析使用者的人數及一般使用形式。部份使用者的資料，包括個人化設定資料會於使用 Cookies 時被收集。Cookies 是載有少量資料的檔案，自動儲存於使用者的電子裝置互聯網瀏覽器內供本公司網站擷取資訊。Cookies 收集的資料是不記名的使用者個人化設定資料，並不含姓名或地址資料或任何資料而可使他人經任何方法聯絡使用者。本公司並不會經此收集或儲存使用者的個人資料。當使用者登入網上銀行及手機銀行服務後，其互聯網瀏覽器將儲存本公司獨有的 Cookies 檔案。當使用者登出後，Cookies 便會失效。如使用者不欲使用 Cookies，使用者可更改瀏覽器的設定。惟使用者將因此不能登入享用本公司的網上銀行及手機銀行服務。

d. 本公司網站及微信官方賬號上的某些部份會特定要求使用者提供個人資料，例如，透過填寫網上表格提交詢問、申請特定產品或服務或註冊使用本公司的網上服務，如網上銀行及手機銀行服務。請閱讀這些產品及服務的適用條款及細則，以及本公司的「資料政策通告」，通知有關本公司對使用者的個人資料的收集目的、該等資料可能移轉予的類別人士、使用者查閱及更正個人資料的權利及其他相關資料。如使用者不同意以上所述，請不要繼續使用本公司網站及微信官方賬號及提供其個人資料予本公司。

e. 在本公司網站所提供有關工作申請的個人資料(如適用)會用作評估申請者的工作申請的適合性。本公司會收集申請者基本個人資料包括姓名、電郵地址、聯絡電話號碼、教育背景及履歷。當經本公司網站進行工作申請，請閱讀本公司就有關僱員記錄的相關通知。如申請者未能提供該等資料可引致本公司不能處理其工作申請。

f. 就本公司流動應用程式服務而言，除非文意另有所指，否則在本聲明中提及到「本公司網站」時應讀為「本公司流動應用程式」。

g. 本公司會於使用者享用本公司流動應用程式及本公司微信官方賬號服務時存取使用者的位置資料以便利使用者找尋附近自動櫃員機或分行或進行附近物業估價，而本公司流動應用程式可能會存取使用者的安裝識別碼以透過流動裝置上的麥克風或藍牙提供各分行的「定點優惠」資訊及相關推播通知，及透過流動裝置上的相機掃描指定條碼以兌換電子優惠券。本公司流動應用程式會存取手機的指紋模組以提供「指紋認證」服務，惟相關指紋資料不會儲存或記錄於本公司資料庫內。另外「按揭專家」應用程式亦需讀取流動裝置上的日曆，藉此將使用者於「置業日曆」更新之行程資料與流動裝置上的日曆同步。惟位置及日曆資料不會儲存或記錄在本公司的數據庫內。此外，手機銀行的「小額轉賬」服務亦會在使用者同意下讀取手機內的通訊錄，藉此使用者可於「小額轉賬」每次選擇「電話簿」功能時可直接選取通訊錄資料。惟有關「電話簿」資料不會儲存或記錄在本公司的數據庫內。若使用者的電子裝置有記憶卡，本公司可能會存取記憶卡內容去修改或刪除儲存於記憶卡的應用程式數據內容，以使用能夠對流動應用程式服務的操作，特別是「電子錢包」應用程式。惟相關資料並不會儲存或記錄於本公司資料庫內。使用者如不欲本公司透過前述方式使用資料，使用者可隨時更改流動裝置的設定、解除安裝流動應用程式或取消關注本公司微信官方賬號。在此情況下，使用者將不能享用本公司的流動應用程式或微信官方賬號的全部服務或只能享用部份的服務。

h. 就「電子錢包」應用程式，本公司可能會讀取及儲存使用者電話識別碼(例如:IMEI)、流動電話 SIM 卡識別碼、及/或「電子錢包」應用程式的識別碼，使能夠進行手機核對及服務支援性檢查程

序，以用作流動支付服務的運作用途。使用者如不欲本公司透過前述方式使用資料，使用者可隨時解除安裝「電子錢包」應用程式。在此情況下，使用者將不能享用本公司的「電子錢包」應用程式服務。

i. 就本公司微信官方賬號，本公司會於使用者關注微信官方賬號後，自動經微信平台獲取使用者微信賬號的賬號識別碼(Open ID)、頭像、暱稱、性別、國家/地區/城市、關注/綁定時間及狀態，以作推送訊息、統計及分析的用途。如有需要，本公司亦有可能將上述資料傳送予服務供應商，以作核證使用者身份及傳送回覆訊息之用〔例如：抽獎結果〕。使用者如不欲向本公司提供上述資料，使用者可取消關注本公司微信官方賬號。在此情況下，使用者將不能享用本公司的微信官方賬號服務。

j. 除本公司於網上銀行、手機銀行、網上商品買賣、網上表格、流動應用程式服務及微信官方賬號服務特定要求使用者提供個人資料，使用者毋須提供其個人資料即可使用本公司網站。

### 個人資料的存檔

資料當事人及/或僱員及/或使用者及/或其他個別人士的個人資料及資料的保存時間不超過將其保存以貫徹該資料於被收集時而被使用於或會被使用於的目的所需的時間及不時為符合法定、監管及會計的規定。

### 個人資料的披露

除非作出有關披露是根據「資料政策通告」及/或(如適用)就有關僱員記錄是根據相關通知及/或得到資料當事人及/或僱員及/或使用者及/或其他個別人士事前同意及/或本公司受約束的任何法例下容許或規定，否則個人資料不會披露予其他人士。

### 個人資料的保安

所有提供予本公司之個人資料及資料均受到保障，只准許獲授權之員工查閱。在傳送資料時，會採用加密法技術予以保障資料當事人、僱員、使用者及其他個別人士敏感性的個人資料。

如本公司聘用(不論是在香港或香港以外聘用)資料處理者，以代本公司處理個人資料，本公司將採用合約規範方法或其他方法，以防止轉移予該資料處理者作處理的個人資料未獲准許或意外地被查閱、處理、刪除、遺失或使用。

### 本公司私隱政策聲明的變更

本聲明會不時更新。請定期聯絡本公司及/或訪問本公司網站以了解本公司最新之私隱政策版本。

### 查閱資料要求及改正資料要求

1. 本公司會按照條例的規定，依從及處理一切查閱資料及改正資料要求。
2. 根據條例中的條款及個人信貸資料實務守則，任何資料當事人有權：
  - a. 查核本公司是否持有他的資料及查閱該等資料；
  - b. 要求本公司改正任何有關他的不準確的資料；
  - c. 查明本公司對於資料的政策及慣例和獲告知本公司持有的個人資料種類；
  - d. 按要求獲告知哪些資料是會向信貸資料服務機構或代收賬款機構例行披露的，以及獲提供進一步資料，藉以向有關信貸資料服務機構或代收賬款機構提出查閱和改正資料要求；及
  - e. 對於本公司向信貸資料服務機構提供的任何賬戶資料(為免生疑問，包括任何賬戶還款資料)，於悉數清償欠款以終止賬戶時，指示本公司要求有關信貸資料服務機構從其資料庫中刪除該

等賬戶資料，惟是項指示必須於賬戶終止後 5 年內發出，且該賬戶在緊接賬戶終止之前 5 年內，並無超過 60 天的拖欠還款紀錄。賬戶還款資料包括最後一次到期的還款額、最後一次報告期間所作出的還款額(即緊接本公司向信貸資料服務機構提供最後一次賬戶資料前不超過 31 天的期間)、剩餘可用信貸額、或未償還款額及欠款資料(即過期欠款額及逾期還款日數、清還過期欠款的日期及全數清還拖欠超過 60 天的欠賬之日期(如有))。

本公司可按照條例依從查閱資料要求收取合理的費用。

#### 聯絡資料

任何關於查閱或改正資料，或索取關於資料政策及慣例或所持有的資料種類的要求，應向下列人士提出：

中國銀行(香港)有限公司

資料保障主任

中國銀行(香港)有限公司

香港花園道 1 號中銀大廈

傳真： +852 2826 6860

中銀信用卡(國際)有限公司

資料保障主任

中銀信用卡(國際)有限公司

香港干諾道西 68 號

中銀信用卡中心 20 樓

傳真： +852 2541 5415

中銀集團人壽保險有限公司

資料保障主任

中銀集團人壽保險有限公司

香港太古城英皇道 1111 號

太古城中心第 1 期 13 樓

傳真： +852 2522 1219

寶生證券及期貨有限公司

資料保障主任

寶生證券及期貨有限公司

香港中環德輔道中 71 號

永安集團大廈 1 樓

傳真： +852 2854 1955

中銀香港資產管理有限公司

資料保障主任

中銀香港資產管理有限公司

香港中環德輔道中 2 號 A

中國銀行大廈 5 樓  
傳真： +852 2532 8216

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二零二一年十一月

## Privacy Policy Statement

The purpose of this Privacy Policy Statement is to establish the policies and practices of BOC Hong Kong (Holdings) Limited and its subsidiaries, including Bank of China (Hong Kong) Limited, BOC Credit Card (International) Limited, BOC Group Life Assurance Company Limited, Po Sang Securities and Futures Limited and BOCHK Asset Management Limited (each a "Company", for so long as such Company remains a subsidiary of BOC Hong Kong (Holdings) Limited and notwithstanding any change in the name of the Company) towards the Company's commitment in protecting personal data privacy in accordance with the provisions of the Personal Data (Privacy) Ordinance (the "Ordinance"). The Company highly values personal privacy and strives to preserve the confidentiality and security of all the personal information which the Company may collect so as to strengthen the trust and confidence between the Company and the Data Subjects, Employees, Users and Other Individuals (as hereinafter defined).

The term "Data Subject(s)", wherever mentioned in this Statement, includes the following categories of individuals:

- a. applicants for or customers, authorized signatories, insured persons, policy holders, beneficiaries and other users of financial, insurance, credit card, securities, commodities, investment, banking and related services and products and facilities and so forth provided by the Company;
- b. sureties, guarantors and parties providing security, guarantee or any form of support for obligations owed to the Company; and
- c. directors, shareholders, officers and managers of any corporate applicants and Data Subjects/users.

The term "Employee(s)", wherever mentioned in this Statement, includes employees and/or applicants for any openings offered by the Company.

The term "User(s)", wherever mentioned in this Statement, includes visitors and/or users of the Company's Website, or when the visitors and/or users communicate with the Company via any electronic devices including but not limited to computer and mobile phone ("Electronic Devices").

The term "Other Individuals", wherever mentioned in this Statement, include suppliers, contractors, service providers, business partners, landlords, tenants, participants of seminars, visitors, other contractual counterparties of the Company and the employee(s) of the above-mentioned parties (if applicable).

For the purposes of this Statement, the "Group" means the Company and its holding companies, branches, subsidiaries, representative offices and affiliates, wherever situated. Affiliates include branches, subsidiaries, representative offices and affiliates of the Company's holding companies, wherever situated.

The rights and obligations of each Company under this Statement are several and not joint. No Company shall be liable for any act or omission by another Company.

#### Kinds of Personal Data Held

There are three broad categories of personal data held in the Company. They comprise personal data contained in the following:

1. Data Subject records, which are necessary for Data Subjects to supply to the Company from time to time:
  - a. in connection with the opening or continuation of accounts and the establishment or continuation of banking facilities or provision of financial, insurance, credit card, securities, commodities, investment, banking and related services and products and facilities;
  - b. in the ordinary course of the continuation of the relationship between the Company and Data Subjects, for example, when Data Subjects write cheques, deposit money, effect transactions through credit cards issued or serviced by the Company or generally communicate verbally or in writing with the Company.
2. Employee records, which include but are not limited to the name, address, e-mail address, contact phone number, educational background, curriculum vitae and relevant personal data of family members of Employees.
3. Other Individuals records, which include but are not limited to the name, address, e-mail address, contact phone number of suppliers, contractors, service providers, business partners, landlords, tenants, participants of seminars, visitors, other contractual counterparties of the Company and the employee(s) of the above-mentioned parties (if applicable); and other operational and administrative records that contain personal data.

#### Purposes of Keeping Personal Data

1. In relation to Data Subjects:
  - a. From time to time, it is necessary for the data subjects to supply the Company with data in connection with the opening or continuation of accounts and the establishment or continuation of banking facilities or provision of financial, insurance, credit card, securities, commodities, investment, banking and related services and products and facilities.
  - b. Failure to supply such data may result in the Company being unable to open or continue accounts or establish or continue banking facilities or provide financial, insurance, credit card, securities, commodities, investment, banking and related services and products and facilities.
  - c. Data relating to the data subjects are collected or received by the Company from various sources from time to time. Such data may include, but not limited to, data collected from data subjects in the ordinary course of the continuation of the relationship between the Company and data subjects, for example, when data subjects write cheques, deposit money, effect transactions through credit cards issued or serviced by the Company or generally communicate verbally or in writing with the Company, and data



obtained from other sources (for example, credit reference agencies). Data may also be generated or combined with other information, available to the Company or any member of the Group.

The purposes for which the data relating to the Data Subjects may be used are as follows:

- a. assessing the merits and suitability of the Data Subjects as actual or potential applicants for financial, insurance, credit card, securities, commodities, investment, banking and related services and products and facilities and/or processing and/or approving their applications, variation, renewals, cancellations, reinstatements and claims;
- b. facilitating the daily operation of the services, credit facilities provided to and/or insurance policies issued to the Data Subjects;
- c. conducting credit checks whenever appropriate (including, without limitation, at the time of application for credit and at the time of regular or special reviews which normally will take place one or more times each year) and carrying out matching procedures (as defined in the Ordinance);
- d. creating and maintaining the Company's scoring models;
- e. providing reference;
- f. assisting other financial institutions to conduct credit checks and collect debts;
- g. ensuring ongoing credit worthiness of Data Subjects;
- h. researching, customer profiling and segmentation and/or designing financial, insurance, credit card, securities, commodities, investment, banking and related services and products and facilities for Data Subjects' use;
- i. marketing services, products and other subjects (please see further details in paragraph 10 of the Company's Data Policy Notice ("DPN"));
- j. determining amounts owed to or by the Data Subjects;
- k. enforcing Data Subjects' obligations, including without limitation the collection of amounts outstanding from Data Subjects and those providing security for Data Subjects' obligations;
- l. complying with the obligations, requirements or arrangements for disclosing and using data that apply to the Company or any of its branches or that it is expected to comply according to:
  - i. any law binding or applying to it within or outside the Hong Kong Special Administrative Region existing currently and in the future (e.g. the Inland Revenue Ordinance and its provisions including those concerning automatic exchange of financial account information);
  - ii. 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 the Hong Kong Special Administrative Region 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);
  - iii. 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 Company or any of its branches 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;
- m. complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the Group 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;
- n. enabling an actual or proposed assignee of the Company, or participant or sub-participant of the Company's rights in respect of the Data Subjects to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation;
  - o. comparing data of Data Subjects or other persons for credit checking, data verification or otherwise producing or verifying data, whether or not for the purpose of taking adverse action against the Data Subjects;
  - p. maintaining a credit history or otherwise, a record of Data Subjects (whether or not there exists any relationship between Data Subjects and the Company) for present and future reference; and
  - q. purposes incidental, associated or relating to the abovementioned purposes.

2. In relation to employees (as and where applicable):

The purposes for which the data relating to the Employees may be used in connection with the employer and employee relationship and human resources management, including but not limited to the purposes as mentioned herein:

- a. processing employment application;
- b. determining and reviewing salaries, bonuses and other benefits should be employed;
- c. conducting reference check with previous employers;
- d. consideration for promotion, transfer or secondment;
- e. monitoring compliance with internal rules of the Company;
- f. any other purposes directly or indirectly relating to the compliance by the Company or any of the employment or statutory obligations; and
- g. administering any affairs or benefits relating to the retirement and insurance plan of Employees.

3. In relation to Other Individuals(as and where applicable):

The purposes for which the data relating to the Other Individuals may be used are as follows:

- a. engaging, managing, monitoring and assessing the business relationship with the suppliers, contractors, service providers, business partners and their staff who provide services to the Company;
- b. managing, monitoring and assessing the landlord and tenant relationship with the landlords and/or tenants;
- c. organizing and delivering seminars for the Company; and
- d. facilitating the daily operation and administration of the above.

Collection and Use of Personal Data

- 1. In relation to the collection of the personal data, the Company will provide the Data Subjects with a copy of the DPN and/or (as and where applicable) the Employees with a copy of relevant Notice in connection with the collection of Employee records and/or (as and where applicable) will notify Other Individuals of 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.
- 2. In relation to the collection of the information and personal data on-line or when the Users communicate with the Company via Electronic Devices, the following provisions shall be applicable to

the Company's Website or when the Users communicate with the Company via the Electronic Devices:

- a. This section is limited to the information collected on the Company's Website, the Company's online advertisements and electronic communications. This section does not apply after the Users leave the Company's Website or when the Users visit third-party's websites where the Company's online advertisements are displayed or links to third-party websites not operated or controlled by the Company.
- b. By browsing the Company's Website, electronically responding to the Company's online advertisements, communicating with the Company via any Electronic Devices, the Users' consent to the Company's use of cookies and the Company's use of the Users' Information in the manner as set out in this section. The Users do not proceed further and do not provide the Information unless the Users' consent to the above.
- c. The Company will record the information of visitors visiting the Company's Website through the web server access log (including the clicking date and time, IP address, pages clicked, browser type, device, operating system and Internet Banking account number (if applicable)). The Company might use the Users' record (and may combine with other personal information of the Users) for the purposes of improving the operation of this website, statistical analysis and marketing. The Company will keep the relevant information for an appropriate period of time based on the actual needs. The Company's web server access log will record the Users' information automatically by default. By continuing browsing the Company's Website, users are deemed to have given their consent for the Company to store, use and transfer the information in the above manner. The Users' visit to the Company's Weixin Official Account may be recorded. The Company may also provide the record of users' visit to Weixin Official Account above to BOC Credit Card (International) Limited for statistical purpose and for analysis on the number of users and general usage patterns. Some of the Users' information including Users' personalized settings information will be gathered through the use of "cookies". Cookies are small bits of information that are automatically stored in the web browser in Users' Electronic Devices that can be retrieved by the Company's Website. The information collected by "cookies" is anonymous visitor's personalized settings information and contain no name or address information or any information that will enable anyone to contact the Users via any means. No Users' personal data will be collected or stored by the Company. For Internet Banking and Mobile Banking services, a "cookie" with a unique identifier assigned by the Company will be stored in the Users' web browsers throughout the session after login. Cookies will be expired upon logging off. Should the Users wish to disable these cookies, the Users may do so by changing the setting of the browser. However, the Users will then not be able to login the Company's Internet Banking and/or Mobile Banking services.
- d. There are sections of the Company's Website and Weixin Official Account where the Company specifically asks for the Users' personal data, for example, when completing online forms to submit an enquiry, applying for a particular product or service or if registering to use the online services, such as Internet Banking and Mobile Banking services. Please refer to and read the applicable terms and conditions for these products and services as well as the DPN informing the types of data collected, purposes of collection, classes of persons to whom the Users' data may be transferred, the rights to access and correct the personal data, and other relevant information. If the Users do not consent to the same, please do not proceed further and do not provide the Users' personal data to the Company and Weixin Official Account.
- e. Personal data collected by the Company through the Company's Website in connection with an application for employment (as and where applicable) will be used to assess the suitability of the

applicant to the job application. The Company may collect the applicant's basic personal data including the name, e-mail address, contact phone number, educational background and curriculum vitae. Please refer to and read the relevant Notice in connection with Employee records when making job application through the Company's Website. Failure to supply such data may result in the Company being unable to process the applicant's employment application.

- f. For the purpose of Mobile Application services, unless the context otherwise requires, references in this Statement to "the Company's Website" shall be read as reference to "the Company's Mobile Application".
- g. For Mobile Application services and "the Company's Weixin Official Account" services, the Company may access the Users' location data to search for the nearest ATM or branch or to conduct valuation of a nearby property. For Mobile Application services, the Company may access the User's installation identification number to deliver the "Location-based Privileges" and related push notification of our respective branches through the Microphone or Bluetooth of the Users' mobile devices, and through the camera of the Users' mobile devices to scan designated barcode to redeem electronic coupon. For fingerprint authentication service, the Company may access the fingerprint authentication module in order to perform the authentication. However, the fingerprint data would not be stored or recorded in the database of the Company. For "Mortgage Expert" Mobile Application, the Company may access mobile device's calendar for the purpose of synchronizing with the event updated by the Mortgage Expert's Calendar. However, no location or calendar data would be stored or recorded in the database of the Company. Furthermore, for the "Small Value Transfer" service of the Mobile Banking, the Company may access the phone book of the mobile device with the User's consent in order to enable the User to select the contact data from the phone book while conducting the Small Value Transfer transaction. However, the data of the phone book would not be stored or recorded in the database of the Company. If there is an SD card available to the Users' Electronic Devices, the Company may access the SD card for storing and retrieving encrypted application data so as to enable the operation of the Company's Mobile Application services, in particular, the "e-Wallet" application. However, no such information would be stored or recorded in the database of the Company. Users who do not allow the Company to use the information in the above manner may at any time change the setting of the Electronic Devices or uninstall the Mobile Application or unfollow the Company's Weixin Official Account. In such event, Users may only be able to partially use or may not be able to use the Company's Mobile Application or Weixin Official Account services.
- h. For "e-Wallet" application, the Company may collect and store the unique identifier of the Users' mobile phone (i.e. IMEI number), of mobile phone SIM card and/or of "e-Wallet" application to enable the handset matching and service eligibility checking for the purpose of operating the mobile payment services. Users who do not allow the Company to use the information in the above manner may at any time uninstall the "e-Wallet" application. In such event, Users will not be able to use the Company's "e-Wallet" application services.
- i. After the Users follow the Company's Weixin Official Account, the Company will access the Users' Open ID, Profile Photo, Nickname, Gender, Country/Region/City, Follow/binding time and status of the Users' Weixin Official Account from Weixin platform automatically for the purpose of pushing notification message, statistical and analysis purposes. The Company may also provide the information above to service provider(s) for the purposes of verifying User's identity and pushing correspondent reply

message (e.g. lucky draw result), if necessary. Users who do not allow the Company to use the information in the above manner may at any time unfollow the Company's Weixin Official Account. In such event, Users may not be able to use the Company's Weixin Official Account services.

- j. Except for Internet Banking, Mobile Banking services, Commodities Internet Trading services, online forms, Mobile Application and Weixin Official Account services where the Company specifically asks for the Users' personal data, the Users can use the Company's Website without providing any of the Users' personal data.

#### Retention of Personal Data

The personal data and information provided by Data Subjects and/or the Employees and/or the Users and/or Other Individuals will not be kept longer than necessary for the fulfillment of the purposes for which the personal data and information 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.

#### Disclosure of Personal Data

The personal data and information would not be disclosed to other parties unless such disclosure is made in accordance with DPN and/or (as and where applicable) the relevant Notice in connection with the collection of Employee records and/or the Data Subjects and/or the Employees and/or the Users and/or Other Individuals have been previously consented to and/or the disclosure is permitted or required by any law binding on the Company.

#### Security of Personal Data

The personal data and information provided to the Company are secured with restricted access by authorized personnel. Encryption technology is employed for sensitive data to protect the privacy of the Data Subjects, the Employees, the Users and Other Individuals during data transmission.

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

#### Changes to the Privacy Policy Statement

The contents of this Statement may be amended from time to time. Please approach the Company and/or visit the Company's Website regularly for the Company's latest privacy policy.

#### Data Access Requests and Data Correction Requests

1. The Company would comply with and process all data access and correction requests in accordance with the provisions of the Ordinance.
2. Under and in accordance with the terms of the Ordinance and the Code of Practice on Consumer Credit Data, any data subject has the right:
  - (a) to check whether the Company holds data about him/her and of access to such data;
  - (b) to require the Company to correct any data relating to him/her which is inaccurate;

(c) to ascertain the Company's policies and practices in relation to data and to be informed of the kind of personal data held by the Company;

(d) to be informed on request which items of data are routinely disclosed to credit reference agencies or debt collection agencies, and be provided with further information to enable the making of an access and correction request to the relevant credit reference agency or debt collection agency; and

(e) in relation to any account data (including, for the avoidance of doubt, any account repayment data) which has been provided by the Company to a credit reference agency, to instruct the Company, upon termination of the account by full repayment, to make a request to the credit reference agency to delete such account data from its database, as long as the instruction is given within five years of termination and at no time was there any default of payment in relation to the account, lasting in excess of 60 days within five years immediately before account termination. Account repayment data include amount last due, amount of payment made during the last reporting period (being a period not exceeding 31 days immediately preceding the last contribution of account data by the Company to a credit reference agency), remaining available credit or outstanding balance and default data (being amount past due and number of days past due, date of settlement of amount past due, and date of final settlement of amount in default lasting in excess of 60 days (if any)).

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

#### Contact Details

The persons to whom requests for access to data or correction of data or for information regarding policies and practices and kinds of data held are to be addressed are as follows:

Bank of China (Hong Kong) Limited

The Data Protection Officer

Bank of China (Hong Kong) Limited

Bank of China Tower

1 Garden Road

Hong Kong

Facsimile: +852 2522 1219

BOC Credit Card (International) Limited

The Data Protection Officer

BOC Credit Card (International) Limited

20/F., BOC Credit Card Centre

68 Connaught Road West

Hong Kong

Facsimile: +852 2541 5415

BOC Group Life

Assurance Company Limited

The Data Protection Officer  
BOC Group Life Assurance Company Limited  
13/F, Cityplaza One,  
1111 King's Road, Taikoo  
Shing  
Hong Kong  
Facsimile: +852 2522 1219

Po Sang Securities and Futures Limited  
The Data Protection Officer  
Po Sang Securities and Futures Limited  
1/F, Wing On House  
71 Des Voeux Road  
Central  
Hong Kong  
Facsimile: +852 2854 1955

BOCHK Asset Management Limited  
The Data Protection Officer  
BOCHK Asset Management Limited  
5/F, Bank of China Building  
2A Des Voeux Road Central  
Hong Kong  
Facsimile: +852 2532 8216

If there is any inconsistency between the English version and the Chinese version of this Statement, the Chinese version shall prevail in relation to any matters arising in the Mainland China exclusive of Hong Kong Special Administrative Region, the English version shall prevail in relation to any matters arising in Hong Kong Special Administrative Region and elsewhere.

November 2021