

## **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 Limited, 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 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:**

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 credit providers in Hong Kong approved for participation in the Multiple Credit Reference Agencies Model 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 12 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); and
  - 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 above-mentioned 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 WeChat Official Account may be recorded. The Company may also provide the record of users' visit to WeChat 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 WeChat 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 WeChat 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. When Users using the Company's Mobile Application services and the Company's WeChat Official Account services, the Company may access the Users' location data to search for the nearest ATM, branch or to conduct valuation of a nearby property. For Mobile Application services, the Company may also access the following of the Users' Electronic Devices: (i) installation identification number, (ii) location data, (iii) microphone, (iv) camera, (v) phone book, (vi) calendar, (vii) biometric authentication module and (viii) speech recognition of the Users' Electronic Devices to provide the related Mobile Application services. However, the location, calendar, biometric data and the related information 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 amending or deleting encrypted application data stored in the SD card so as to enable the operation of the Company's Mobile Application services. 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 WeChat 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 WeChat Official Account services.



- h. For BoC Pay, the Company may collect and store the device ID of the Users' mobile phone to enable the handset matching and service eligibility checking for the purpose of operating BoC Pay. Users who do not allow the Company to use the information in the above manner may at any time uninstall the BoC Pay. In such event, Users will not be able to use the Company's BoC Pay services.
- i. After the Users follow the Company's WeChat 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' WeChat Official Account from WeChat 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 WeChat Official Account. In such event, Users may not be able to use the Company's WeChat Official Account services.
- j. Except for Internet Banking, Mobile Banking services, Commodities Internet Trading services, online forms, Mobile Application and WeChat 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 and/or Transfer of Personal Data**

The personal data and information would not be disclosed and/or transferred to other parties unless such disclosure and/or transfer 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 and/or transfer 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**

The Company would comply with and process all data access and correction requests in accordance with the provisions of the Ordinance.

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 3717 4635

**BOC Credit Card (International) Limited**

The Data Protection Officer  
BOC Credit Card (International) Limited  
15/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, 1111 King's Road,  
Taikoo Shing, Hong Kong  
Facsimile: +852 2522 1219

**Po Sang Securities Limited**

The Data Protection Officer  
Po Sang Securities Limited  
4/F, BOC Yuen Long Commercial Centre,  
102–108 Castle Peak Road, Yuen Long, New Territories, Hong Kong  
Facsimile: +852 2905 1909

**BOCHK Asset Management Limited**

The Data Protection Officer  
BOCHK Asset Management Limited  
40/F, Bank of China Tower,  
1 Garden Road 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.

Nov 2023