

HSBC Bank (China) Company Limited
Personal Information and Privacy Protection Policy
(For Corporate Business)

Date of Update: 30 May 2024

Effective Date: 30 May 2024

HSBC Bank (China) Company Limited (“HSBC”, “the Bank”, “we” or “us”) take the confidentiality and security of personal information very seriously, and strive at all times to protect personal information and privacy of our customers and other related personal information subjects (“you” or “Personal Information Subject”) according to law. We therefore formulate this Personal Information and Privacy Protection Policy for corporate business (this “Policy”) to help you understand the purposes, methods, and scope of personal information we collect and use, our practices regarding personal information and privacy protection, your rights and interests with regard to personal information and privacy and how to assert your rights and interests.

This Policy shall apply to personal information of you when you visit, browse, or use our website or mobile device application, apply for or use any product, device or service of us, handle any business or make any transaction with us on behalf of relevant corporate business customers (“Corporate Business Customers” or “Relevant Customers”), provide personal guarantee to Relevant Customers, participate in any of our marketing events and surveys, and in any way contact or correspond with us in the context of corporate business. We shall collect, use, store, disclose, and protect your personal information in accordance with this Policy. We may separately issue specific personal information protection policy tailor made for specific channels, products, services, businesses and activities (such as the Personal Information and Privacy Protection Policy for Corporate Digital Banking Services). The specific personal information protection policy so made shall apply in the specific scenarios as prescribed in such policy. If there is any discrepancy between this Policy and the other agreements entered into or other terms and conditions agreed between you or Relevant Customer and us, such other agreements or terms and conditions shall prevail.

In the context of corporate business, we understand that you have agreed that Relevant Customers can use your personal information for the purpose described in this Policy, and therefore, we treat Relevant Customers as your authorized representatives related to your personal data processing activities.

In terms of corporate business, this Policy has replaced the previous Personal Information and Privacy Protection Policy. Any reference to the Personal Information and Privacy Protection Policy in any document in relation to corporate business shall be deemed to be a reference to this Policy.

Please read through this Policy carefully and pay particular attention to the provisions that are bolded and underlined which we think have material impacts on your interests and/or deal with your sensitive personal information. The key points of this Policy are summarized as below:

1. For your convenience to understand the purpose and category of personal information we collect when you sign up for our service, we therefore explain them under the particular service scenario.
2. When you sign up for some particular services, we will collect your sensitive personal information after you give us express consent if required by applicable laws and regulations. Refusal on providing consent might affect you use related service, but will not affect you use other services we provided.
3. To provide the service per your or Relevant Customers' request, we might need to share your personal information to a third party. We will carefully assess the legitimacy, propriety, and necessity of the data sharing with the third party. We will ask the relevant third party to take all data protection measures required pursuant to applicable laws and regulations.

We fully understand how important your personal information means to you, and we will exert our best effort to protect the security of your personal information. We have always been committed to maintain your trust and will stick to below principles to protect your personal information: Right and Responsibility Consistency, Explicit Purpose, Freely Given Consent, Minimum and Necessity, Assurance of Information Security, Participation, Fairness and Transparency. We are also committed to take appropriate security measures to protect your information.

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I. How We Protect Your Personal Information

1. Information security is our top priority. We will endeavour at all times to safeguard your personal information against unauthorised or accidental access, processing or damage. We maintain this commitment to information security by implementing appropriate security and managerial measures to secure your personal information. We will take responsibility in accordance with the law if your personal information suffers from unauthorised access, public disclosure, erasure or damage for a reason attributable to us and so impairs your lawful rights and interests.
2. Our website supports advanced encryption technology - an existing industry standard for encryption over the internet to protect your personal information. When you provide sensitive personal information through our website or applications, it will be automatically converted into codes so as to ensure secure transmission afterwards. Our web servers are protected behind "firewalls" and our systems are monitored to prevent any unauthorized access. Our mobile banking application software for corporate banking services has passed the software filing for financial client mobile application with National Internet Finance Association of China.
3. We maintain strict security system to prevent unauthorized access to your personal information. We exercise strict management over our staff members who may have access to your personal information, including but not limited to access control applied to different positions, contractual obligation of confidentiality agreed with relevant staff members, formulation and implementation of information security related policies and procedures, and information security related training offered to staff.
4. We will not disclose your personal information to any third party, unless the disclosure is made to comply with laws, regulations and regulatory requirements or according to this Policy or based on your or Relevant Customers' separate consent or authorisation. When we use services provided by external service providers (entities or individuals), we also impose strict confidentiality obligations on them and require them to take all data protection measures required pursuant to applicable laws and regulations when processing your personal information.
5. **For the security of your personal information, you take on the same responsibility as us. You shall properly take care of your personal information, such as your identity verification information (e.g. user name, password, dynamic password, verification code, etc.), and all the documents, devices or other media that may record or otherwise relate to such information, and shall**

ensure your personal information and relevant documents, devices or other media are used only in a secured environment. You shall not, at any time, disclose to any other person or allow any other person to use such information and relevant documents, devices or other media. Once you think your personal information and/or relevant documents, devices or other media have been disclosed, lost or stolen, or may otherwise affect the security of use of our products, devices or services by you or Relevant Customers, you shall notify us immediately so that we may take appropriate measures to prevent further loss from occurring.

6. We will organize regular staff training and drills on emergency response so as to let the relevant staff be familiar with their job duties and emergency procedures. If unfortunately personal information security incident occurs, we will adopt emergency plan and take relevant actions and remediation measures to mitigate the severity and losses in connection therewith. Meanwhile, we will, following the applicable requirements set out in law and regulation, inform you or Relevant Customers of the basic information of the security incident and its possible impact, the actions and measures we have taken or will take, suggestions for you to prevent and mitigate the risk, and applicable remediation measures. We will inform you or Relevant Customers about the security incident by email, mail, call, SMS, push notification or through other methods as appropriate in a timely manner. Where it is difficult to notify each Personal Information Subject, we will post public notice in a reasonable and effective way. Meanwhile, we will report such personal information security incident and our actions in accordance with applicable law, regulation and regulatory requirements.

II. How We Collect Your Personal Information

1. Personal information refers to any kind of information related to an identified or identifiable natural person as electronically or otherwise recorded, excluding information that has been anonymized. Personal information include name, birth date, ID certificate information (ID card, passport and etc.), personal biometrics recognition information, contact information, address, account information, property status, location and etc. Sensitive personal information refers to personal or property information that, once leaked or illegally provided or misused, may harm personal or property safety and will easily lead to infringement of the personal reputation, human dignity, physical or psychological health, or discriminatory treatment. Such information mainly includes ID certificate information (ID card, passport and etc.), personal biometrics recognition information, credit information, property information, transaction information, medical and health information, specific identity, financial account, individual location tracking etc. as well as any personal information of a minor under the age of 14 (i.e. child).

2. For the purpose of complying with law, regulation and regulatory provision, or as required for us to provide you or Relevant Customers with various products and services and continuously improve our products and services, or in order to contact or communicate with you or Relevant Customers, understand the needs of you or Relevant Customers, build up, review, maintain and develop our relationship with you or Relevant Customers, we may receive and keep the personal information provided by yourself or by Relevant Customers, or, according to law, regulation, regulatory provision, your or Relevant Customers' authorisation or consent, collect, enquire, and verify by proper methods your and/or related parties' personal information from/with members of the HSBC Group or other third parties (including but not limited to credit reference agencies, information service providers, relevant authorities, employers, counterparties, joint applicants, contact persons, close relatives and other entities/individuals). "HSBC Group" under this Policy means HSBC Holdings plc, and/or any of, its affiliates, subsidiaries, associated entities and any of their branches and offices (together or individually), and "member of the HSBC Group" has the same meaning.
3. The personal information we so collect may be recorded in paper, electronic means (including but not limited to the information we collect via our self-service machine, website, online banking, client mobile application, WeChat account, WeChat application or other mobile device applications, email, SMS or other channels) or any other means.
4. When you visit, browse, use our website and/or applications as a visitor, we may collect information about the browser or device you use (such as IP address, operating system, and browser version), your browsing actions and patterns. We use Cookies and similar technologies to collect above information. You may disable Cookies by changing your settings (for details, please refer to Article VII of this Policy "How We Use Cookies and Similar Technologies").

The technical information which cannot identify any individual will not be treated as personal information. However, when such technical information can identify the individual alone or in combination with other information, we will protect it as your personal information.

We may invite you to subscribe to our newsletter, updates, alerts or to participate in our marketing events or survey via our website and/or applications (such as our WeChat subscription account). If you accept relevant invitation, we may collect the information you provide to us by filling out contact forms or questionnaires, etc. The said information may include name, telephone number, mobile phone number, email, employer name, and job position etc. Refusal to provide such information will not affect your visiting, browsing or using our website and/or applications.

5. When you give or propose to give guarantees for obligations owed by Relevant Customers to us or for credit facilities provided by us in the context of corporate business, we may collect the following information upon your or Relevant Customer's consent or authorization or in accordance with applicable laws and regulations:

Products/Services/Business	Information We May Need to Collect
To give or propose to give guarantees for obligations owed by Relevant Customers to the Bank or for credit facilities provided by us in the context of corporate business	<p><u>(1) Personal identity information, including your personal name, gender, nationality, place of birth, date of birth, ID certificate information (including certificate type, number, date of expiry, issue country/region, certificate images), contact information (fixed telephone number, mobile phone number, e-mail, mailing address), employment status (industry, occupation, job position, employer), marital status, your relationship with Relevant Customers (such as employment/shareholding/investment relationship);</u></p> <p><u>(2) Personal property information, including personal income status, real property, movable property, indebtedness, investment status, tax-paid amount, tax resident status, taxpayer identification number etc.;</u></p> <p><u>(3) Personal account information (if any), including your account number, account type, account opening date, account opening institution, account balance and account transaction status;</u></p> <p><u>(4) Personal credit bureau information, we may inquire about your credit information and/or credit reports from the Basic Financial Credit Information Database, public sources and other legally established credit reference agencies, including your credit card, loans, and other credit transaction information, contingent liabilities, litigation, investigation, punishment information, and other information that reflects your personal credit profile;</u></p> <p><u>(5) Other personal information arising from customer investigation, including personal information collected during customer due diligence, sanctions or anti-money</u></p>

	<u>laundering checks;</u> (6) Any other personal information acquired during the establishment or maintenance of business relationship for the performance of contracts, compliance with laws, regulations and regulatory requirements, proper and secure operation of banking business, or prevention and controlling banking related risk, e.g. <u>personal information included in the customer documentation, personal information arising from any suspicious and unusual activity investigation, correspondence or other communication records (including video or audio records, call log and correspondence records and contents).</u>
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The above information is the basic information we must collect to proceed relevant guarantee business, to perform our contract with you or Relevant Customers and to comply with laws, regulations and regulatory requirements. If you refuse to provide those information (or the information so provided is incomplete, inaccurate or untrue), you or Relevant Customers will not be able to use the relevant banking products or services we provide.

6. When you are a connected person of our prospect or existing Relevant Customers (for the purpose of this Policy, connected person means any other person with whom our prospect or existing Relevant customer has a relationship, including but not limited to, a director, supervisor or employee of a company, partners or members of a partnership, any shareholder, substantial owner, controlling person, or beneficial owner, trustee, settler or protector of a trust, account holder of a designated account, payee of a designated payment, representative, agent or nominee of the account holder, or the account holder's principal where the account holder is acting on another's behalf), we may collect the following information upon your or Relevant Customer's consent or authorization or in accordance with applicable laws and regulations:

Products/Services/Business	Information We May Need to Collect

To provide deposits and account products or services to Relevant Customers in the context of corporate business	<u>Your personal identity information , including your personal name, gender, nationality, place of birth, date of birth, ID certificate information (including certificate type, number, date of expiry, issue country/region, certificate images), employer, job position, your relationship with Relevant Customers (such as employment/shareholding/investment relationship), contact information (fixed telephone number, mobile phone number, e-mail, mailing address), residence address, work address, photo, personal virtual identity and authentication information (e.g. login information required for internet banking and client mobile application in the context of corporate business), any relationship with PEP and relevant information;</u>
To provide payment products or services to Relevant Customers in the context of corporate business	<u>Individual payer/payee information, including payer/payee name, account opening bank, account number, transaction amount, transaction currency, payer address information (applicable to cross border payments only) and transaction remarks.</u>
To provide markets and securities products or services to Relevant Customers in the context of corporate business	<u>In addition to the personal information as described under the above corporate account product(s) or service(s) scenario, when you are the beneficiaries for securities products and services offered by the Bank to the Relevant Customers, we need to collect your personal account information, including account name, account number, account type, account transaction details, account balance, account opening institution and account opening date.</u>
Apply to all above products/services/business	<u>(1) For the handling persons of the Relevant Customers, we need to collect the name, ID certificate information (including certificate type, number, date of expiry, issue country/region, certificate images), contact information (fixed telephone number, mobile phone number, e-mail, mailing address), personal virtual identity and authentication information (e.g. login information required for corporate online banking);</u>

	<p><u>(2) Other personal information arising from customer investigation, including personal information collected during customer due diligence, sanctions or anti-money laundering checks;</u></p> <p><u>(3) Any other personal information acquired during the establishment or maintenance of business relationship for the performance of contracts, compliance with laws, regulations and regulatory requirements, proper and secure operation of banking business, or prevention and controlling banking related risk, e.g. personal information included in the customer documentation, personal information arising from any suspicious and unusual activity investigation, correspondence or other communication records (including video or audio records, call log and correspondence records and contents).</u> When using digital banking, your device type, operating system, device ID (applicable on client mobile app only), Mac address, unique device identifier (applicable on client mobile app only - iOS will collect UUID, Android OS will collect IMEI and Android ID), the Open ID and Union ID associated with WeChat service account and mini programs (applicable on WeChat account, WeChat application only), software version, logon IP address, internet service provider (ISP), device accelerators (such as gravity sensing devices, etc.). <u>Technical information that may not be used to identify an individual's identity will not be treated as personal information. But if the information alone or in combination with other information may be used to identify your identity, we will treat it as your personal information and have it properly protected.</u></p>
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The above information is the basic information we must collect to provide products or services to Relevant Customers, to perform our contract with such customers and to comply with laws, regulations and regulatory requirements. If you refuse to provide those information (or the information

so provided is incomplete, inaccurate or untrue), Relevant Customers will not be able to use the relevant banking products or services we provide.

7. You may decide, at your free choice, to provide us, or allow us to collect from you or any third party as you agree, the relevant information for specific purposes or functions, for example, the personal information that you provide to us for the purposes of improving service experience, participating in our marketing activities or survey, making an appointment to open an account or for other business. You can choose not to provide such information. Your failure to provide such information will make you unable to participate or enjoy the corresponding convenience or functions, but will not affect your normal use of our other services.
8. **Please understand that the services we provide are constantly evolving. If you or Relevant Customers choose to use any other service not listed above for which we have to collect your information, we will separately explain to you or Relevant Customers, the purposes, methods, and scope of personal information we collect, through reminders on pages, interaction with you or Relevant Customers, agreements entered into with you or Relevant Customers or other appropriate method, and obtain your or Relevant Customers' consent for that. We will use, store, disclose, and protect your information in accordance with this Policy and other agreements (if any) between you or Relevant Customers and us. If you or Relevant Customers choose not to provide certain information, you or Relevant Customers may be unable to use certain or part of the service, but your or Relevant Customers' use of other services we provide will not be affected.**

III. How We Use Your Personal Information

1. When you visit, browse, use our website and/or applications as a visitor, we may use your information for the following purposes:
 - (1) to respond to your queries and requests;
 - (2) to provide you with information, products or services that you request from us or which we feel may interest you, subject to your prior consent;
 - (3) to perform contracts or agreements entered into between you and us;
 - (4) to allow you to interact with us at our website and/or applications;
 - (5) to notify you about changes to our website and/or applications;
 - (6) to ensure the content of our website and/or application is presented in an effective manner on your device;

- (7) to maintain proper and secure operation of website and/or applications as well as banking business or services, to prevent and control risk, or to detect and prevent misuse or abuse of our website, applications, products or services;
 - (8) to meet the compliance obligations of us or the HSBC Group, or to comply with any applicable laws and regulations that we and HSBC Group are subject to; and
 - (9) to make statistics and analysis of the use of our business, products, services or functions. But such statistics will not contain any of your personally identifiable information.
2. When you are a connected person of our Relevant Customers or providing personal guarantee to our Relevant Customers, we may use your information for the following purposes:
- (1) to provide Relevant Customers with products or services, handle relevant personal guarantee business, to recognize or verify the identity of you or Relevant Customers, or to approve, manage, handle, execute or effect transactions requested or authorised by you or Relevant Customers;
 - (2) to comply with any Applicable Laws (“Applicable Laws” refer to any applicable statute, law, regulation, ordinance, rule, judgment, decree, voluntary code, directive, sanctions regime, court order applicable to any member of the HSBC Group, agreement between any member of the HSBC Group and an authority, or agreement or treaty between authorities and applicable to the Bank or a member of the HSBC Group) and any order or requirement from any authority;
 - (3) to perform the Bank’s and/or the HSBC Group’s compliance obligations (including regulatory compliance, tax compliance and/or compliance with any Applicable Laws or requirement of any authority), or to implement any policy or procedure made by the Bank and/or the HSBC Group for the performance of compliance obligations;
 - (4) to ensure safe and stable financial services, prevention or prohibition of illegal or incompliant activities, to control or reduce risks, to detect, investigate and prevent any real, suspected or potential financial crime (including money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions, and/or violations, or acts or attempts to circumvent or violate any Applicable Laws relating to these matters) and to manage financial crime risk;

- (5) to collect any amounts due from any debtor;
 - (6) to conduct credit or credit reference checks, to verify, obtain or provide credit references or credit information;
 - (7) to enforce or defend the Bank or any member of the HSBC Group's rights, or to perform the Bank or any member of the HSBC Group's obligations;
 - (8) as required by or to fulfil the Bank or the HSBC Group's reasonable operational requirements (including for credit and risk management, data statistics, analysis, processing and handling, archiving and recording, system, product and service design, research, development and improvement, planning, insurance, audit and administrative purposes);
 - (9) market or promote relevant products or services to Relevant Customers, to assess Relevant Customers' interests in relevant products or services, or to conduct market research or survey or satisfaction survey; and
 - (10) to obtain or utilize administrative, consultancy, telecommunications, computer, payment, data storage, processing, outsourcing and/or other products or services.
3. **The above information collection and use in this Policy shall not impact our use of your information for the purposes as otherwise agreed between you or Relevant Customers and us.**
4. If we use your personal information for the purposes other than the purposes of information collection and use as set forth in this Policy or in other agreement between you or Relevant Customers and us, we shall inform you how we use this information and obtain consent from you or Relevant Customers before using your personal information for such additional purposes as per applicable laws and regulations.

IV. How We Store Your Personal Information

In principle, the personal information we collect and generate within the territory of the People's Republic of China will be stored in the territory of the People's Republic of China. Since we provide products or services through resources and servers across the world, which means that to the extent permitted by regulatory rules and applicable laws, your personal information may be transferred to the foreign jurisdiction, or be accessed from these jurisdictions. If we transfer your personal information overseas, we will comply with applicable laws and regulations related to cross border data sharing. Whether it is processed domestically or overseas, in accordance with applicable data protection legislation, your personal information

will be protected by a strict code of secrecy and security which, the Bank, other members of the HSBC Group, their staff and third parties are subject to.

We comply with Chinese laws and regulations on data storage. When we collect or process your information, we will, according to applicable laws and regulations, regulatory, archival, accounting, auditing or reporting requirements, and the purposes as set forth in this Policy, store your information for a period as minimum as necessary to fulfil the purposes of information collection. For example, in accordance with *Administrative Measures for the Customer Identification Verification and Preservation of Customer Identification Material and Transaction Records of Financial Institutions*, *Administrative Rules on RMB Settlement Accounts* and relevant financial regulations as well as *Provisions on the Scope of Collection and Preservation Period in the Document Archiving of Enterprises*, the customer materials shall be kept for at least 5 to 30 years or even longer, depending on the usage purpose and document nature of relevant material. We have data retention policies. After the retention period expires under relevant data retention policy, we will destroy, delete or anonymize relevant information, or where the destruction, deletion or anonymization is not possible, store your personal information securely and separate it from other data processing. **The exception is when the information needs to be retained according to applicable laws and regulations, regulatory, archival, accounting, auditing or reporting requirements, special agreement between you or Relevant Customers and us, or for settlement of indebtedness between you or Relevant Customers and us, or for record check or enquiry from you, Relevant Customers, regulators or other authorities.**

V. How We Share, Transfer and Publicly Disclose Your Personal Information

1. Entrusted Processing and Sharing

For the purposes set out above in this Policy, we may provide or disclose all or part of your personal information to the following recipients under the preconditions that such provision or disclosure is necessary and is made with proper protective measures (please refer to Article I of this Policy “How We Protect Your Personal Information” for details) and the recipients may also, for the aforesaid purposes, use, process or further disclose the information they receive provided that corresponding protective measures are adopted pursuant to the applicable laws or our requirements:

- (1) any member of the HSBC Group;**
- (2) any contractor, subcontractor, agent, third party product or service provider, licensor, professional consultant, business partner, or associated**

person of the HSBC Group (including their employees, directors and officers);

- (3) any regulator of the Bank or any member of the HSBC Group or any other authority, or any organisation or individual designated by such regulators or authorities;
- (4) anyone acting on behalf of Relevant Customers according to authorisation of Relevant Customers or according to law, payment recipients, beneficiaries, account nominees, intermediary, correspondent and agent banks (e.g. for CHAPS, BACS SWIFT), clearing houses, clearing or settlement systems, market counterparts, upstream withholding agents, swap or trade repositories, stock exchanges, companies in which Relevant Customers have an interest in securities (where such securities are held by us for Relevant Customers), or anyone making any payment to Relevant Customers;
- (5) any person or related party who has the right or obligation, acquires an interest or assumes risk, in or in connection with any product or service Relevant Customers receive from the Bank, or any business Relevant Customers handle at the Bank or any transaction Relevant Customers make with the Bank (for example, the person who provides or intends to provide any mortgage or other security for any of Relevant Customers' debt to the Bank);
- (6) other financial institutions, industrial associations, credit rating agencies, credit reference agencies (including without limitation, the Basic Financial Credit Information Database) or information service providers;
- (7) any third party fund manager providing Relevant Customers with asset management services through us;
- (8) any third party to whom we provide referral, agency or intermediary service; and
- (9) any party in connection with any business/asset transfer, restructure, disposal, merger, spin-off or acquisition transactions of the Bank.

Subject to applicable laws and regulations, we will seek separate consent (if legally required) from you or Relevant Customers and notify you of the data sharing with the third parties, including the data recipient's identity, contact information, purpose of processing, method of processing and the type of personal information.

In case of cross border personal data sharing, we will also conclude a data protection agreement with the offshore personal information recipient, and if required, in the format of standard data protection clause issued by Cyberspace Administration of China as well as specify your relevant personal information subject's right in your capacity as a third party beneficiary under said agreement pursuant to applicable laws and regulations, for example the manner and method of exercising your right towards the offshore personal information recipient. If you want to know more details about aforesaid data protection agreement, you may contact us to raise such request via the method listed in Article IX of this Policy "How to Contact Us".

2. Transfer

Without separate consent from you or Relevant Customers, we will not transfer your personal information to any other company, organization or individual, except **in the case of business/asset transfer, restructure, disposal, merger, spin-off or acquisition transactions where the transfer is necessary. In such cases, we will inform you or Relevant Customers of the identity and contact method of the personal information recipient as per applicable laws and regulations as well as request said recipient to comply with this Policy. If the personal information recipient changes the purposes and methods of personal information processing activities under this Policy, it shall re-obtain the consent from you or Relevant Customers.**

3. Public Disclosure

We will not disclose your personal information to the public unless we have your separate consent.

VI. Special Circumstances for Information Processing

We will process your personal information (such as information collection, storage, use, analysis, transfer, provision, disclosure) based on your consent. To the extent allowed by laws and regulations, we may process your personal information without your consent under the following circumstances:

- (1) **where it is necessary for entering into a contract or the performance of a contract to which you are the party;**
- (2) **where it is necessary for compliance with a legal obligation to which we are subject;**
- (3) **where it is necessary in order to protect your or others' vital interests related to life and property in an emergency or respond to public health emergencies;**

- (4) where it is within reasonable limits in order to carry out news coverage or media supervision for the public interest;
- (5) where it is within reasonable range according to law to process the information which has been legally made public or publicized by yourself;
or
- (6) other circumstances stipulated by laws and regulations.

VII. How We Use Cookies and Similar Technologies

1. Your visit, browse, use of any of our website or digital banking service related applications may be recorded for analysis on the number of visitors to the site and/or applications, general use patterns and your personal use patterns and improving your experience. Some of this information will be gathered through the use of “Cookies” and similar technologies. Such technologies can enable our website or applications to recognise your device and store information about your use of website and/or applications so to provide continuous services to you and to tailor the content of our website/applications to suit your interests and, where permitted by you, to provide you with promotional materials based on your use patterns. We will be able to access the information stored on the Cookies and similar technologies for the aforesaid purposes.

The information collected by Cookies is anonymous aggregated data, and contains no personal information such as name, address, telephone, email etc.

2. **Most local terminals are initially set to accept Cookies. You can manage or disable Cookies based on your own preference. Should you wish to disable the Cookies, you may do so by changing the setting on your local terminals. However, after changing the setting you may not be able to enjoy the convenience that Cookies bring, but your normal use of other functions of the local terminals will not be affected.** Different local terminals offer different methods for setting changes, and you can find information on how to manage cookie settings on certain browsers via the following links.

- [Cookie settings in Chrome](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Safari](#)

VIII. Your Rights Relating to Personal Information

1. You have the right to request us to protect and secure your personal information in accordance with the provisions of the law, regulation and this Policy. You have the right to exercise your rights of individual granted by applicable laws and regulations.
2. You have the right to check with us whether we hold your personal information as well as to access and copy your personal information.
3. You have the right to change the scope of authorization or withdraw your consent. We will not further process the related information once you change your authorization. Please note the withdrawal of consent will not affect the lawfulness of processing based on consent given by you or Relevant Customers before its withdrawal.
4. **You have the right and obligation to update your personal information with us to ensure that all the information is accurate and up-to-date.** You have the right to request us to provide convenience for you to update your personal information with us and to correct any of your information that is inaccurate.
5. In relation to personal guarantee, you have the right to request to be informed of your personal information that is disclosed to credit reference agencies by us, so as to enable your request to the relevant credit reference agencies for access to and correction of your information.
6. You have the right to request us to delete or otherwise properly dispose of your personal information that is beyond retention period in accordance with the applicable law and regulation, this Policy, and other agreement between you or Relevant Customers and us. If we cease our operation, we will stop collecting any personal data from you in a timely manner, delete or anonymize all your personal information, and inform Relevant Customers represented by you of such operation cessation via courier or public announcement, except as otherwise provided by laws and regulations or where the personal data deletion is technically not possible.
7. Nothing in this Policy shall limit the other rights you should have as a Personal Information Subject under applicable laws and regulations.

IX. How to Contact Us

1. Requests for access to, copy, correction or deletion of personal information, for change/withdrawal of authorisation or disposal of personal information beyond retention period, for a copy of this Policy, enquiries about our practices regarding personal information and privacy protection, or exercising other rights you are granted by the applicable laws and regulations, should be addressed to:

Data Privacy Officer (DPO)
HSBC Bank (China) Company Limited
36/F HSBC Building, Shanghai IFC, 8 Century Avenue, Pudong, Shanghai,
200120
Tel: +86 400 821 8878 (8:30am - 5:30pm, Monday to Friday during the working
days)

2. For security purpose, you may need to raise your request in written form or use other methods to prove your identity. We may verify your identity before processing your request.
3. Upon the receipt of your request, we will reply to you within 15 working days or shorter period as prescribed by law and regulation (if any).
4. We will not charge fees for the processing of your above-mentioned reasonable requests for checking, correcting or otherwise disposing of your personal information.

Notwithstanding the foregoing, we may reject your request if it is illegal, noncompliant, or unnecessarily repeated, needs excessive technical means (for example, the need to develop information systems or fundamentally change current practices), brings risks to the legitimate rights and interests of others, is unreasonable or technically impracticable.

We may not be able to respond to your request under any of the following circumstances:

- (1) **where the request is in relation to our legal and financial compliance obligation under laws and regulations;**
- (2) **where the request is in direct relation to state security or national defence security;**
- (3) **where the request is in direct relation to public security, public sanitation, or major public interests;**
- (4) **where the request is in direct relation to criminal investigations, prosecutions, trials, execution of rulings, etc.;**
- (5) **where there is sufficient evidence that you are intentionally malicious or abuse your rights;**
- (6) **where the purpose is to protect you or other individual's life, property and other substantial legal interests but difficult to acquire your**

consent;

(7) where responses to your request will give rise to serious damage to your or any other individual or organisation's legal rights and interests; or

(8) where the request involves any trade secret.

5. You may supervise or make suggestions for our practices regarding personal information and privacy protection, and lodge complaints or demand compensation according to law against us or our staff for any infringement of your rights and interests in your personal information and privacy.

If you have any query, complaint, feedback, comment or suggestion, or have problem with automated decision results, please [Contact HSBC](#). You may contact us through the contact information listed in this Policy, by calling our hotline or visiting our branches or sub-branches. You may also visit our official website www.hsbc.com.cn to enquire the nearby branches or sub-branches, or other contact information of us suitable for you.

X. Protection of Minors' Personal Information

Our products, services and website related to corporate business are targeting Corporate Business Customers. The minors under the age of 18 (including children under the age of 14) cannot create business accounts at the Bank. But certain business (such as payment settlement service under corporate online banking channel) may collect minors' information. If, in the course of business, we notice that Relevant Customers fail to obtain consent from the minor's parents or guardians before providing relevant minors' information to us, we will request Relevant Customers to immediately stop further sharing such information with us and take other remediation actions.

XI. Formulation, Effectiveness, Update of this Policy and Others

1. **The Policy is made by us and published at our websites and takes effect on the date of issuance.** The Policy may be amended or updated from time to time, particularly in the events of major changes as follows:

- (1) Major changes in our service model, such as changes in the purpose of processing personal information, changes in the types of personal information being processed, the use methods of personal information, etc.;
- (2) Major changes in our ownership structure, organisational structure, etc., such as changes as result of business adjustments, bankruptcy, mergers, etc.;
- (3) Changes in the main objects of personal information sharing, transfer or

public disclosure;

- (4) Significant changes in your rights relating to personal information or in the methods to exercise such rights;
- (5) Changes of our contacts for personal information related requests/enquiries, changes of our contacts for complaint or feedback;
- (6) Other major changes which may significantly impact your interests in personal information.

We will post the changes to the Policy or the updated Policy through pop-ups, announcements, etc. on our website. Changes to the Policy shall not diminish or limit the rights you should have as a personal information subject under applicable laws and regulations.

- 2. **Where you provide to us personal information about another person, you should ensure that person acknowledges this Policy, and, in particular, tell him/her how we may collect and use his/her personal information and obtain the consent/authorization of such person.** You should remind that person to read this Policy in advance and may also give him/her a copy of this Policy.
- 3. In case of discrepancy between the Chinese and English versions of this Policy, the Chinese version shall apply and prevail.