

The Shanghai Commercial & Savings Bank, Ltd. Singapore Branch Personal Data Protection Policy

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The Shanghai Commercial & Savings Bank, Ltd. Singapore Branch (the “**Branch**”) recognizes the importance of protecting individual rights in relation to privacy and personal data. As such, the Branch strives to collect, store, use, process and disclose personal data in a manner consistent with the Personal Data Protection Act 2012 (“**PDPA**”).

This Personal Data Protection Policy (“**Policy**”) will form part of the terms and conditions governing your relationship with the Branch and its related corporations, and should be read in conjunction with any and all terms and conditions to which your relationship with the Branch is subject.

For the purposes of this Policy, “**personal data**” means data, whether true or not, about you, from which you can be identified, or from that data and other information which the Branch has or is likely to have access to. Personal data includes, but is not limited to, data such as your name, identification number, telephone numbers, addresses, email addresses and any other information relating to individuals which you have provided to the Branch.

I. Purpose and Use

The Branch needs to collect, use, store, transfer, disclose and otherwise process certain personal data in order to run its business effectively, carry out day to day operations, meet corporate objectives and otherwise comply with relevant regulatory and legal obligations. Specific examples of how personal data is used in the Branch’s business include, but are not limited to:

- a. evaluating and processing your request for any of the products and/or services offered or distributed by the Branch (including but not limited to third party products and/or services);
- b. evaluating and determining the terms of such offering or distribution, including price and eligibility;
- c. providing banking (and other ancillary) products and/or services as requested;
- d. conducting research (whether conducted by the Branch or by a third party) for the purposes of developing or improving products, services, security, service quality, and marketing strategies (including but not limited to that provided by third parties);
- e. offering and marketing to you, in various modes, any products, services, special offers, promotions or events provided by the Branch which we think may be of interest to you;

- f. performing verification and such security checks as the Branch may reasonably require to detect, prevent and/or investigate any crime, offence or breaches of terms of agreements;
- g. performing checks with the Do Not Call Registry;
- h. generating financial, regulatory, management or other related reports and performance of analytics;
- i. managing internal business operations;
- j. performing accounting, administrative and other record keeping functions;
- k. complying with the Branch's internal policies and procedures and any applicable rules, laws, regulations, codes of practice, guidelines, orders or requests issued by any court, legal or regulatory bodies (both national and international), including any applicable reporting and regulatory requirements;
- l. budgeting, and auditing and tracking organizational progress;
- m. for legal purposes (including but not limiting to seeking advice and enforcing the Branch's legal rights, drafting and reviewing of documents and facilitating dispute resolution);
- n. facilitating any proposed or actual business assignment, transfer, participation or sub-participation in any of the Branch's rights or obligations;
- o. providing customer support, responding to inquiries, and handling feedback and/or complaints;
- p. assessing job application and managing the employment relationship; and
- q. purposes which are reasonably related to the aforesaid.

The Branch will handle personal data appropriately, in line with the circumstances at hand, and for lawful and targeted purposes. In the event that any intended use of personal data goes beyond the purposes envisioned during collection, the Branch will notify its customers of the new purpose(s) and seek consent to use their personal data for such purpose(s).

II. Collection

The Branch may collect personal data regarding its customers through several means. The Branch will use its reasonable endeavours to ensure that any collection of personal data will be legitimate, adequate and relevant without being excessive to the envisioned purpose.

The Branch collects personal data from its customers primarily (but not wholly) through account applications, forms, surveys, applications and other materials obtained during the course of transactions. The Branch may also seek additional information from third parties such as credit bureaus or relevant authorities in order to comply with the law and/or process specific requests.

III. Management

a. Accuracy

In order to assist the Branch in maintaining accurate, complete and up-to-date personal data, customers should update the Branch's representatives of any relevant changes in a timely manner. The Branch will nevertheless use reasonable endeavours to ensure that personal data collected is accurate and kept up-to-date (especially where the Branch is likely to rely on and use the personal data to provide products and services to the customer or otherwise make a decision that affects the customer or where the Branch is likely to disclose such personal data to another organization).

b. Security

Personal data within the Branch's possession or control will be kept confidential and be subject to reasonable and appropriate physical, procedural and technological security arrangements in order to guard against risks such as unauthorized access, collection, use, disclosure, copying, modification, disposal, loss, destruction, falsification or similar risks .

However, in order to carry out the purposes listed above, the Branch may, to the extent permitted by applicable law and/or regulation, share personal data with third parties, whether in Singapore or elsewhere. When doing so, the Branch will require them to ensure that personal data so disclosed is kept similarly confidential and secure.

c. Third Party Personal Data

In addition to the foregoing, by providing personal data of a third party (e.g. information of next-of-kin, emergency contact, family members) to us, you also represent and warrant that consent from that third party has been obtained for the collection, use and disclosure of that personal data by the Branch for the purposes listed above.

d. Withdrawal of Consent, Access and Correction of Personal Data

Individuals may withdraw their consent to any use or disclosure by the Branch of their personal data at any time. The Branch will also accommodate reasonable and rational requests by individuals to obtain access and make corrections to their personal data. All withdrawals of consent as well as requests for correction must be made in writing with sufficient details to the Senior Compliance Manager for the Branch to identify the applicant and the relevant personal data (together with such proof of identity as required). Requests for access and correction will be subject to payment of a fee depending on the nature and complexity of your request for

accessing such data. If you withdraw any consent given, depending on the nature of your request, the Branch may not be able to carry on certain business and transactions with you, and your withdrawal may result in a breach of contractual obligations or undertakings to the Branch, in which case, the Branch's legal rights and remedies are expressly reserved.

e. Retention

The Branch will retain personal data only for so long as necessary to fulfill the purpose(s) for which it was collected, unless a longer retention period is required or permitted by law. If for any reason the deletion of personal data is overly onerous and expensive, the Branch will remove the means by which such personal data can be associated with particular individuals.

IV. Disclosure

In general, personal data will not be disclosed to third parties except in line with the following:

a. Outsourcing and Transfer

In line with its obligations under the PDPA, personal data required for the performance of services outsourced by the Branch shall only be communicated to external entities in accordance with the law and only to the extent necessary. The PDPA requires the Branch to take appropriate steps to ascertain whether, and to ensure that, the recipient of the personal data will be bound by legally enforceable obligations to provide the transferred personal data a standard of protection that is at least comparable to the protection under the PDPA. In this regard, the Branch will obtain contractual assurances from its agents (or third parties who receive such data, howsoever named) prior to the transferring of any personal data (whether within or outside Singapore) to the extent permitted by the PDPA in line with the above.

b. The Shanghai Commercial & Savings Bank Affiliates

The Branch may share personal data with its affiliates to the extent reasonably necessary for business purposes insofar as they do not contravene this Policy or the PDPA.

c. Legal Purposes

Do note that the Branch may be required to disclose personal data to authorities pursuant to investigations, audits or reporting obligations. In such circumstances, the Branch is exempted from obtaining consent.

V. CCTV (Closed-Circuit Television Cameras) Surveillance

The Branch needs to place a notification sign, for example : "This Area is under Camera Surveillance" at the main entrance to ensure that customers or visitors are aware that the CCTVs are operating within the premise for security reasons.

VI. Do Not Call Register Provisions of PDPA

This provision is not applicable to the Branch as the Branch does not make any marketing calls, text messages and fax messages. The Branch sends specified fax message or specified text message only if such message is the subject of an ongoing relationship with the existing customers.

VII. Further Information

Any consent given pursuant to this Policy shall not derogate from, and shall be without prejudice to, any other rights which the Branch may have to collect, use and disclose your personal data, and nothing herein is to be construed as limiting the same.

The Branch has a designated Senior Compliance Manager who assists in ensuring compliance with the Branch's Policy and dealing with miscellaneous data security issues.

All enquiries, complaints and concerns in relation to this Policy or personal data protection should be directed to the Senior Compliance Manager. Customers who wish to withdraw their consent to the use of their personal data or to access or amend their personal data should do likewise. Do note that all enquiries must include the individual's name, address and other relevant contact information. The Branch will use reasonable efforts to address customers' requests and enquiries without undue delay.

The Branch reserves the right to review and revise this Policy from time to time to ensure that it is consistent with any changes in laws and regulations. The Branch may amend this Policy from time to time to ensure that it is consistent with any changes in laws and regulations. The Branch will make available such updated policy at its office in Singapore. All communications, transactions and dealings with the Branch shall be subject always to the latest version of this Policy in force at the time.

VIII. Conclusion

This Policy as amended from time to time, is hereby approved by the President.