

Privacy Notice

Shanghai Commercial Bank Limited (referred to in this Privacy Notice as the "**Bank**", "**we**", "**us**" and "**our**") is committed to protecting, respecting your privacy and ensuring the highest level of security for your personal information. This Privacy Notice explains the types of personal information we collect, how we use that information, who we share it with, and how we protect that information.

This Privacy Notice sets out the basis on which we process personal information. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

Where applicable, this Privacy Notice should be read in conjunction with the Bank's Circular to Customers and Other Individuals relating to the Collection and Handling of Personal Data (as amended from time to time) and other relevant documents available on our site or provided to you.

1. Who We Are

For the purpose of applicable data protection law, the controller is Shanghai Commercial Bank Limited which is incorporated and registered in Hong Kong with its registered office at Shanghai Commercial Bank Tower, 12 Queen's Road, Central, Hong Kong and whose London branch address is at 65 Cornhill, London EC3V 3NB.

2. What information is covered by this Privacy Notice?

This Privacy Notice covers all personal information processed by us which means information that (either in isolation or in combination with other information) enables you to be identified directly or indirectly.

3. What information do we collect from you?

We may collect information about you from the following sources:

3.1 Information we receive from you

We may collect your personal information from you when you:

- Submit applications to open an account.
- Submit applications to apply for any loans and other banking facilities.
- Fill in forms on our site www.shacombank.com.hk ("**our site**").
- Correspond with us by phone, e-mail or otherwise.
- Supply us with information via interfaces powered by artificial intelligence.

This includes information you provide when you use our products and services, register to use our site, subscribe to our i-Banking Service and when you report a problem with our site. The information you give us may include:

- Identification data: name, gender, nationality, marital status, passport or other identification details, National Insurance number
- Contact data: postal and e-mail address, previous addresses, telephone and fax number.
- Employment and professional data: occupation, employment details, company background, information, financial accounts of company, details of Authorised Signer / Director / Shareholder / Controlling Person (Corporate Customer).
- Financial data: assets, income, tax residency and other financial information.
- Behavioural and preference data: personal description, your preferences, and feedback and survey responses.

3.2 Information we collect about you

We may collect information about you from other sources, including from third parties who provide services to you or us, your employers (for example, to verify your employment data), insurers (for example, to support insurance-linked products), other banks or financial services providers (for example, to facilitate account switching, transaction processing, credit assessments), credit reference, fraud prevention, law enforcement or government agencies and publicly available sources. The types of data which may be collected

include without limitation your identification data, contact data, financial data, behavioural data, technical data (including geo-location data) and other data from public sources.

With regard to each of your visits to our site we may automatically collect the following information:

- **technical data:** including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- **usage data:** information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

4. Legal Basis for Processing

The law requires us to have a legal basis for collecting and using your personal information. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal information where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal information where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal information for a specified purpose, for example if you subscribe to marketing correspondence.

5. Uses made of the information

We use information held about you in the following ways:

| Purpose/Use | Type of data | Legal basis |
|--|---|---|
| To consider and assess your application for products and services, including credit facilities | Identification data, contact data, financial data, employment and professional data | Performance of a contract |
| To carry out our obligations under contracts and provide requested products/services, including handling requests, complaints, and queries | Identification data, contact data, financial data, behavioural and preference data | Performance of a contract; Necessary for our legitimate interests (providing efficient customer service, managing and resolving complaints and queries) |
| To provide you with information about other goods/services similar to those you already use or have enquired about, or those that may interest you | Contact data, behavioural and preference data, usage data | Necessary for our legitimate interests (marketing of similar products, personalised recommendations); Consent, having obtained your prior consent to receiving direct marketing communications |
| To notify you about changes to our service | Identification data, contact data, behavioural and preference data | Performance of a contract; Legal obligation; |

| | | |
|--|---|---|
| | | Necessary for our legitimate interests (to keep our records updated and manage our relationship with you) |
| To improve the site and ensure site content is presented effectively for you and your computer | Usage data, technical data | Necessary for our legitimate interests (optimising user experience) |
| To administer the site and for internal operations including troubleshooting, analysis, testing, research, statistics, and surveys | Identification data, contact data, usage data, technical data | Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise); Legal obligation |
| To allow you to participate in interactive features of our service when you choose to | Identification data, contact data, usage data, behavioural and preference data | Performance of a contract; Necessary for our legitimate interests (enabling user engagement and improving services) |
| To keep the site safe and secure | Identification data, contact data, technical data | Necessary for our legitimate interests (security, fraud prevention); Legal obligation |
| To measure or understand advertising effectiveness and deliver relevant advertising | Usage data, behavioural and preference, technical data | Necessary for our legitimate interests (marketing analytics); Consent, having obtained your prior consent to receiving direct marketing communications |
| To conduct credit and status checks, including periodic reviews | Financial data, identification data, contact data, employment and professional data | Legal obligation; Performance of a contract |

Our group or our third party service providers may use big data analytics and artificial intelligence (BDAl) to process, analyse or predict data / result relating to the data subjects to achieve the purposes listed above. Our group may also use BDAl to facilitate automated decision-making for enhancing customer services and experiences, strengthening risk management and compliance, offering personalized products and services, as well as improving operational efficiency. Where we use automated decision-making, including decisions supported by artificial intelligence, that produces legal or similarly significant effects, you have the right to request human intervention, to express your point of view, and to challenge the decision.

5.1 Information we receive from other sources

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above.

Please note we may also process your personal information in order to comply with legal or regulatory obligations, including: to verify your identity prior to entering into a relationship with you; to establish your creditworthiness prior to entering into any banking relationship with you; to monitor the relationship with our customers; to notify you of transactions so you can monitor the activity on your accounts; and to provide you with information relating to certain products.

With your consent, we may send you carefully selected information about our products and services. You have the right to withdraw your consent to such direct marketing at any time.

6. Disclosure of your information

We may share your personal information with the parties set out below where necessary and for the purposes set out in this policy.

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

- Business partners, agents, suppliers and sub-contractors for the performance of any contract we enter into with you or other dealings we have in the normal course of business with you.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Credit reference agencies and other external auditors and advisers.
- Other banks and financial services providers.
- Third party service providers with whom you have chosen to interact with in connection with your application for our products and services.
- Third party guarantors or other companies that provide you with benefits or services.
- HM Revenue & Customs, regulators and other authorities.
- The police and other law enforcement agencies.
- Insurers and their underwriters.
- Any actual or proposed assignee of the Bank or participant or sub-participant or transferee of the Bank's rights.
- Any person with your express or implied consent.
- Any person where we have legitimate interests for doing so.

We may also disclose your personal information to third parties:

- In the event that we sell, transfer, merge with or buy any business or assets, in which case we may disclose your personal information to the seller or buyer of such business or assets. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Notice.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation or regulatory duty in all applicable jurisdictions.
- We may disclose your personal information to third parties where disclosure is both legally permissible and necessary to protect or defend our rights to enforce our [terms of use](#) or [terms and conditions](#) for the use of our i-Banking Services or our other agreements; or to protect the property, or safety of Shanghai Commercial Bank Limited, or to protect the rights of our customers or those of the public. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7. Where we store your personal information

The data that we collect from you may be transferred to, processed in and stored (whether on the cloud or not) at a destination outside the UK and/or the European Economic Area ("EEA"), in particular your data will be stored in Hong Kong. It may also be processed by staff operating outside the EEA, including our staffs in Hong Kong, who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of support services. We take appropriate steps to ensure that your data is treated securely and in accordance with this Privacy Notice and with applicable data protection law and will ensure that appropriate safeguards are in place to protect your personal information during and after transfers to outside the UK and/or EEA.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our site, as transmission occurs over networks outside our control, and therefore any transmission is at your own risk. Once we have received your personal information, we will implement appropriate steps, including technical and organisational measures and security features, to protect against unauthorised access.

8. Your rights

You have the following rights (if applicable):

- **Access.** You have the right to request a copy of the personal information we are processing about you.
- **Rectification.** If you believe that we hold any incomplete or inaccurate information about you, you have the right to ask us to rectify the inaccurate data or complete it if it is incomplete. We will update/correct the information as quickly as is practicable; unless there is a valid reason for not doing so, at which point you will be notified.
- **Deletion.** You also have the right to request erasure of information we process about you, except we are not obliged to do so if we need to retain such information in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- **Restriction.** You have the right to restrict processing of information about you where you believe such information to be inaccurate; our processing is unlawful; or that we no longer need to process such information for a particular purpose unless we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.

- **Objection.** Where the legal justification for processing of information about you is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.
- **Portability.** You have the portability right to obtain personal information we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) personal information which you have provided to us, and (b) if we are processing that information on the basis of your consent or to perform a contract with you.
- **Withdrawing Consent.** If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time. This includes cases where you wish to opt out from marketing emails.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; to ensure that your information is protected and kept secure. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month to respond if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

You can make a request to exercise any of these rights in relation to your personal information by sending the request by mail to Shanghai Commercial Bank Limited, 65 Cornhill, London EC3V 3NB, United Kingdom or by email to ld.contact@shacombank.com.hk.

You also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection law. If you are based in, or the issue relates to, the UK, the Information Commissioners Office can be contacted as follows:

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| Telephone: | +44 0303 123 1113 |
| Email: | icocasework@ico.org.uk |
| Website: | www.ico.org.uk |
| Web-form: | www.ico.org.uk/concerns/ |
| Address: | Water Lane, Wycliffe House, Wilmslow, Cheshire, SK9 5AF |

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for how your personal information is handled by third parties. Please check these policies before you submit any personal information to these websites.

9. How do we protect your personal information?

We have implemented technical and organisational security measures to safeguard the personal information in our custody and control. Such measures include, for example, limiting access to personal information only to employees and authorised service providers who need to know such information for the purposes described in this Privacy Notice, as well as other administrative, technical and physical safeguards. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

While we have implemented appropriate technical and organisational security measures to protect our systems, sites, operations and information against unauthorised access, use, modification and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors outside our control, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers.

10. How long do we keep your personal information?

We will only retain your personal information for as long as necessary for the purpose for which that information was collected and to the extent permitted by applicable law. When we no longer need to use personal information, we will remove it from our systems and records and/or take steps to anonymise it so that you can no longer be identified from it.

We may need to retain your information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes, for example to help us respond to queries or complaints, prevent fraud and financial crime, or to respond to requests from regulators.

11. How do we deal with children's privacy?

We will not knowingly collect personal information from individuals under the age of eighteen (18) years. If you are under the age of 18 you should not provide information to us. If we become aware that a person under 18 has provided personal information to us, we will remove such personal information from our files.

12. Changes to our Privacy Notice

Any changes we may make to our Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Notice.

13. Contact

Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to Shanghai Commercial Bank Limited, 65 Cornhill, London EC3V 3NB, United Kingdom or email: Id.contact@shacombank.com.hk.

You can also contact our Data Protection Manager at +44 (020) 7369 8888