



Personal Data Protection Policy

(Effective March 2020)

Your privacy is important to us. This Personal Data Protection Policy (“**Policy**”) is prepared and managed in accordance to the prevailing personal data protection laws, including but not limited to the Singapore Personal Data Protection Act (Act No. 26 of 2012) (“**PDPA**”), the European General Data Protection Regulation (“**GDPR**”) and any other privacy policy we may be required to comply with from time to time. PDPA and GDPR, where relevant would include any supplement and revision hereafter. This Policy sets how Industrial and Commercial Bank of China Limited, Singapore branch (“**ICBC Singapore**”) collect, process, use and disclose your personal data. This Policy applies to all individual data in our possession and control.

When you bank with us, you agree and consent to ICBC Singapore and our group of companies (i.e. Industrial and Commercial Bank of China Limited (“**ICBC**”), its subsidiaries, affiliates and all other ICBC branches offices worldwide) (collectively “**ICBC Group**”), ICBC Group’s agents, authorized service providers, consultants, advisers and relevant third parties (“**Authorized Representatives**”) (ICBC Group and its Authorized Representative are collectively, “we”, “us”) collecting using disclosing and sharing amongst ourselves your personal data and disclosing to our authorized service providers your personal data in the manner set out in this Policy.

1. What is Personal Data

“**Personal Data**” means any data can be used to identify a natural person. Some examples of Personal Data we collect (the list is not exhaustive) when you interact or bank with us are as follows:-

- (a) personal particulars (e.g.: name, contact numbers, email addresses residential address, date of birth, identity card/ passport details, education, marital status) and any other information relating to you which you have provided us in any form you may have submitted to us or in other forms of interaction with you;
- (b) specimen signature;
- (c) banking information (e.g.: bank account number, transaction details);
- (d) financial details (e.g.: income, expenses, credit history);
- (e) images (e.g.: CCTV footage), voice recording;
- (f) employment details (e.g.: occupation, directorship, positions held, employment history, salary, benefits) (in certain situation such as job application or service tender, may include past employment details);
- (g) tax/ insurance information;
- (h) information on your risk profile, investment objectives, knowledge, experience, business interest;
- (i) your feedback/ opinion; and
- (j) information from your mobile device with your consent (e.g.: device location and information).

2. How we use your Personal Data

We may use your Personal Data for our business purpose such as: -

- (a) provide our (including our strategic partners) services or products to you (include researching on new service or products) (e.g.: account maintenance, printing of statements);
- (b) assess, process your application/ instructions/ requests for any products/services;
- (c) verify your identity;
- (d) communicate with you (e.g.: updating you with updates/ changes/ suspension/ cessation to any features of our products/s services);
- (e) respond / investigate to feedback/ queries/ complaints/ claims/ disputes;
- (f) monitoring products/ services we offer;
- (g) conduct or facilitate the conduct of credit check or other due diligence checks under any applicable laws;
- (h) comply with obligations imposed on us by any credit bureau or credit information sharing platform that we subscribe;
- (i) create/ maintain your credit/ risk profile;
- (j) comply with all applicable laws, regulations, guidelines, directives, court orders from all authorities having jurisdiction over us (including government, tax or law enforcement);
- (k) prevent or assist any law enforcement to investigate (including investigating on our own) any crime or offence (include an attempt of it);
- (l) manage our own policies procedures operations, infrastructure;
- (m) enforce our rights/ obligations (e.g.: debts due to us);
- (n) allow us to do reporting (e.g.: financial, regulatory, credit) to authorities or our head office;
- (o) facilitate business asset transactions (e.g.: enabling proposed or actual transfer or assignments, mergers, acquisitions);
- (p) seek professional/consultant advise (e.g.: legal, tax etc);
- (q) records keeping (whether in electronic or physical form);
- (r) manage our risks within the Bank or the ICBC Group which includes but is not limited to taking adverse action against you;
- (s) promoting, furthering and improving the provision of services by the Bank or any member of the ICBC Group to you;
- (t) conduct promotions (e.g.: lucky draw, redemption of gifts);
- (u) considering your employment with us;
- (v) considering having you as our business partner for any services which we may find suitable for you to provide us with; and
- (w) all other purpose set out in our terms and conditions for the respective products/ services.

Where GDPR applies, the legal basis for processing of your Personal Data could also be that it is necessary for our legitimate interests pursued by us or by another third party described in Section 3, provided that they are not overridden by your interests, or fundamental rights or freedoms. These legitimate interests include using information to purposes we describe in Section 2 above.

You should ensure that your Personal Data submitted to us are correct and updated at all times for us to provide and continue to provide our service/ product to you. If you submit Personal Data belonging to any third party, you represent to us that you have obtained consent from that said third party to allow our use of their Personal Data. You must furnish us the evidence of the third party consent upon our request.

3. Where do we process your Personal Data?

- (a) ICBC Singapore is a member of the ICBC Group with our Head Office based in China. Our servers are located in Singapore and China. Personal Data collected is transmitted to data storage facilities where the ICBC Singapore and the ICBC Group keep its central records. Personal Data will be made available to all authorised persons including strategic partners, third party service providers and other members of the ICBC Group in connection with ICBC Singapore's provision of products and services to you. This may result in the transfer of your information to countries where our affiliates and members of the ICBC Group are located. These parties include, where applicable to the accounts, product or service you receive: -
- i. recipients and beneficiaries of payments, intermediaries and other banks;
 - ii. a third party provider (“**TPP**”) that you have authorised to give your information on accounts held with us to or to initiate payments on your behalf;
 - iii. specialized payment institutions or companies e.g. SWIFT; or
 - iv. other financial institutions.
- (b) If you are an EU resident, where we transfer Personal Data outside the European Economic Area, this is done either on the basis that it is necessary for the provision of products and services to you from us or anyone within ICBC Group. We take compliance steps so that such international recipients are subject to appropriate measures designed to protect personal information.
- (c) Any transfer will be subject to the stricter of the PDPA, EU Commissions model contracts for the transfer of personal data to third countries, pursuant to Decision 2004/915/EC and Decision 2010/87/EU and any other applicable privacy laws. Detailed measures we undertake to safeguard your Personal Data can be obtained by contacting us at dataprivacy@sg.icbc.com.cn.

4. Children's Privacy

We do not collect Personal Data from a child below the age of sixteen (16) without parental consent. If you are a child, parental consent will be required before your use of any of our products or services. Parents can contact us at icbcsg@sg.icbc.com.cn to withdraw consent for use of some or all of their child's Personal Data and to restrict our use of their child's Personal Data under certain circumstances. In such cases, the Bank reserves the right to refuse to serve you if your parent has withdrawn consent to our collection, use or disclosure of any Personal Data necessary for us to provide you with the same products and services.

5. Use for marketing/ promotion purpose

- (a) We use your Personal Data for offers, promotions that we offer for our products/services. You may receive email, direct mailers, SMS/ MMS, any other phone-based messaging, phone calls or fax from us in compliance with the PDPA and any other privacy laws applicable to us.
- (b) Telemarketing messages sent to your Singapore telephone number via phone calls, SMS/MMS, any other phone-based messaging or fax, will only be sent to you if we have your consent in writing, or if you have not registered your number in the Do-Not-Call Registry. However, if you already have an ongoing banking relationship with us, you will receive such telemarketing messages for the products or services we offer.
- (c) You can withdraw your consent to receiving messages for marketing/promotion purposes at anytime by contacting us. If you change your mind after that, you may contact us to give us your consent again.

6. Disclosure

We may disclose or share your Personal Data with the following parties on condition that they keep your Personal Data confidential and secure:-

- (a) ICBC Group (including ICBC our head office, its subsidiaries, affiliates and any other ICBC branches worldwide);
- (b) Our agents, consultants, service providers, professional advisers;
- (c) Our strategic partners (e.g.: insurance companies, co brand card partners);
- (d) Credit bureau or dispute resolution centre;
- (e) Our assignees, transferees (actual or prospective);
- (f) Liquidator, receiver official assignee judicial manager appointed in connection with bankruptcy, liquidation, winding up or judicial management or any analogous process;
- (g) Operators of any payment systems;
- (h) Any authorities having jurisdiction over us (e.g.: regulatory body, government, law enforcement, courts, securities futures exchange);
- (i) Our merchants; and
- (j) Third party offering our customers reward, loyalty and privileges.

7. Cookies

When you visit our websites and mobile banking applications, we will ask for your consent to use cookies (if any). Cookies are a small data file sent and stored in your computer, smartphone or electronic device for accessing the internet. They allow a website to recognize a user's device and track your use of our electronic services. We use this to improve our services by determining your preferences on products and services, frequency of use and provide important security features to protect your data and accounts. You may change your browser settings to disable the cookies. If you do so, you may not be able to visit some parts of our website.

8. Other 3rd party website

Our website may contain links to other websites. These 3rd party websites are not maintained by us. If you use our links to visit the 3rd party website, you are bound by their terms and you are reminded to read and understand their privacy policy.

9. Withdrawal of consent

You may withdraw your consent anytime by contacting us. If you do so, depending on the extent of your withdrawal, we may be unable to continue provide you with the service/ product. All our rights and remedies are reserved regardless of your withdrawal of consent.

10. Retention

We will only retain your Personal Data for as long as it is necessary for legal and our business purposes.

11. Access & correction

You may request for access and correction of your Personal Data subject to any prevailing laws (including but not limited to the Personal Data Protection Act (Act No. 26 of 2012)) and regulatory requirements of any governmental authority applicable to ICBC Singapore. We reserve the right to charge you a fee for processing your request.

12. Statutory Rights (EEA Residents only)

Under the conditions set out under applicable law (i.e. GDPR), you have the following rights: -

- (a) you have a right to ask us to rectify inaccurate personal information we collect and process and the right to request restriction of your personal information pending such a request being considered;
- (b) where your personal information is processed on the basis of your consent, you have the right to withdraw that consent at any time;
- (c) you can ask us to stop processing your personal information or request deletion of your personal information;
- (d) if we use your information to market directly to you, your right to object extends to that direct marketing, including profiling to the extent it is related to such marketing;
- (e) where we rely on your consent for using personal information, or where our use of personal information is necessary to enter into or perform under a contract with you, you may have the right to request your personal information be ported to you or to another data controller; and
- (f) you have the right to ask us for a copy of your personal information.

You can exercise the rights set out above using the details in Section 15 of this Policy. Please note that the rights set out above may be limited under the applicable national data protection law.

13. Other Privacy Policy

This Policy shall form part of any ICBC Group's Privacy Policy issued from time to time and all our terms and condition for all our respective products and services and is to be read together with it. In the event of conflict or inconsistency, the stricter requirements apply.

14. Consent, Amendments & updates

Your consent under this Policy supplements other consents you have already given to us and does not supersede the earlier. Your consent is in addition to our rights under all other applicable laws to collect, use and disclose your Personal Data.

We reserve the right to update, amend or supplement this Policy from time to time. You agree that all updates or amendments to this Policy can be done by informing you via our website. This Policy is available at any of our branches in Singapore or on our website or upon request.

15. Contact us

If you need to contact us or provide feedback, you can do so by visiting any of our branches, visiting our website or you can email us at icbcsg@sg.icbc.com.cn.

(As at 12 March 2020)