

“ ICBC(Asia) Apps Service Personal Data Collection and Privacy Policy Statement” (Effective Date: 03 December 2020)

I User Information Protection Guidelines

Industrial and Commercial Bank of China (Asia) Limited (the "Bank" or “ICBC(Asia)”) values customers privacy and will take all reasonable measures to protect customer personal data will be protected. The Bank will explain how the Bank collects, uses, stores and shares the information when using our Apps products or services, and how the Bank accesses, updates, deletes and protects the information through the “ Apps Service Personal Data Collection and Privacy Policy Statement”. The Bank will also take all reasonable measures to ensure that the customers personal information collected, retained and provided by the Bank is accurate. In case of any inaccuracies is found in the Bank's records, the Bank will take prompt measures to make appropriate corrections.

“ Apps Service Personal Data Collection and Privacy Policy Statement” will be applicable to all of our Apps products/or services. For Internet banking service, the “E-Banking Services Personal Information Collection and Privacy Policy Statements” will be referred.

By using the Apps you are agreeing to the terms set out below and continuing to use this Apps following the posting of any changes to these terms will signify your consent to the changes made. If customers do not agree to the terms and conditions below, please do not use the Apps .

II Types, Purpose and Content of Personal Data Collection

i) Types of Personal Data Collection

When using our Apps' service, the Apps will collect the information that customers provide when using the service or generated during using the service, which can optimize our services and keep the customer account safe:

When customers use the Apps' service, in order to ensure customers are using our services normally, maintain the operation of our service normally, improve and optimize our service experience and ensure the security of customer accounts, the Bank will collect the log information from customers' mobile as follows:

Device model, operating system, device identifier, login IP address, the way of access network , type and status, network quality data, operation log, service log information, etc.

This type of information is fundamental that must be collected for the Bank to provide the services.

ii) Authorization of Accessing Personal Data

When customers use the Apps' services, the Bank may need customers to grant the following personal authorities in order to ensure they are using our services normally, safeguard the normal operation of our services, improve our services and protect customer accounts' security:

Camera: QR code scanning, facial recognition, bank card scanning and other functions.

Album: Storage of and access to QR code pictures and identity documents, pictures, and other functions.

Positioning: Getting the users' locations, automatically providing corresponding regional services and outlet map, and other functions.

Fingerprint/Face ID: Log-on or small-value payment authentication and other functions.

Phone book: Provide services related to mobile phone related service in a simplest way.

Such authorization information is sensitive information.

In order to comply with the following matters or to perform the Bank' s duties, requirements or arrangements (whether compulsory or voluntary), the Bank may access customers' personal data without necessarily obtaining their authorization in advance:

1) Complying with any international treaties, economic or trade sanctions regimes, law, regulation, judgment, court order, industry norms (refer to as "Laws") with binding or applicable over all or any part of the ICBC(Asia) within or outside the Hong Kong Special Administrative Region (refer to "Hong Kong") exist currently and in future (e.g. the Inland Revenue Ordinance and its provisions including those related to automatic exchange of financial account information);

2) Complying with any current or future guidelines, guidance, policy or requests given or issued by any court, regulatory, government, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of

financial services providers with binding or applicable over all or any part of the ICBC(Asia), within or outside Hong Kong, or ICBC(Asia) (e.g. guidelines, guidance or requests given or issued by the Inland Revenue Department including those related to automatic exchange of financial account information) ;

3) Due to commercial activities, any current or future contractual or other commitments undertaken or applicable to ICBC(Asia) that is assumed by any court, regulator, government, tax, law enforcement or other authorities, or self-regulator or industry bodies or associations of financial services providers with jurisdiction over all or any part of the ICBC(Asia), within or outside Hong Kong (collectively called "Authorities");Or any agreement or treaty between Authorities;

4) Conduct any action to meet our obligations of measures or arrangements within ICBC(Asia) on prevention or detection of money laundering, terrorist financing or other unlawful activities;

5) Fulfilling responsibility given by Laws of prevention or detection or investigation on any acts or attempts to circumvent or violate money laundering, terrorist financing,

bribery, tax evasion, fraud, evasion of economic or trade sanctions and/or relating to these matters ;

- 6) To sign and fulfill the necessary terms if agreement according to your requirements;
- 7) Information collected will be used for maintaining the products and proper operation provided, e.g. in case of discovery and handling product or service failure;
- 8) Any circumstances relating to, supplementary or inevitable to the above mentioned matters

Please make sure that the functions and services the Bank provide to customers will be updated and developed from time to time. If a certain function or service is not included in the above description but the Bank has collected customers' information, the Bank will inform customers of the use of content and scope , purpose of information collection, obtain customers' consent by screen message prompt and announcement on our bank website.

iii) Purpose of Personal Data Collection

- 1) The information of the data subjects may be used for the following purposes: To handle the applications for banking/financial services and credit facilities;
- 2) The daily operation of the services and credit facilities provided to data subjects;
- 3) Conducting credit checks at the time of application for credit and at the time of regular or special reviews which normally will take place once or more a year;;
- 4) Creating and maintaining the Bank' s credit scoring models;
- 5) Provision of reference (status inquiries);
- 6) Assisting other financial institutions to conduct credit checks and collect debts;
- 7) Ensuring ongoing credit worthiness of data subjects;
- 8) Designing financial services or related products for data subjects' use;
- 9) Marketing services, products and other subjects in respect of which the Bank may or may not be remunerated;
- 10) Determining the amount of indebtedness owed to or by data subjects;
- 11) The enforcement of data subjects' obligations, including without limitation the collection of amounts outstanding from

data subjects and those providing security for data subjects' obligations;

12) Comply with the obligations, requirements or arrangements for disclosing and using data that apply to the Bank or a Bank Group Company or that it is expected to comply according to:

(a) any laws binding or applying to it within or outside Hong Kong existing currently and in the future (e.g. the Inland Revenue Ordinance and its provisions including those concerning automatic exchange of financial account information) or any court order being enforceable on it;

(b) any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, laws enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside Hong Kong existing currently and in the future (e.g. guidelines or guidance given or issued by the Inland Revenue Department including those related to automatic exchange of financial account information);

(c) any present or future contractual or other commitment with local or foreign legal, regulator, governmental, tax, laws enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services

providers that is assumed or imposed by the Bank or the Bank Group Company by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, laws enforcement or other authority, or self-regulatory or industry bodies or associations;

13) Comply with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the group of the Bank and/or any other use of data and information in accordance with any group-wide programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing. tax evasion or other unlawful activities;

14) Enable an actual or proposed assignee of the Bank or a Bank Group Company, or participant or sub-participant of the rights of the Bank or those of a Bank Group Company in respect of the data subject to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation;

15) Exchanging information with merchants which accept credit cards issued by the Bank and entities with whom the Bank provides /co-branded /private label credit card services (“merchant” or an “co-branded merchant”);

16) Verify identity with data subjects with any card merchant acquirer in connection with any card transactions;

17) For purposes of risk management of the Bank group , we may use your data for maintaining a credit history or other bank record (whether or not there exists any relationship between data subjects and the Bank) for present and future reference; and for the purposes of related use.

III Information Storage

The Bank will retain customer information properly in accordance with the relevant laws, regulations and regulatory requirements of The Government of the Hong Kong Special Administrative Region .

In general, the Bank only retains customer information if necessary for the realization of customer service, such as:

Mobile number, E-mail Address: The Bank needs to retain customer' s mobile number and the e-mail address for 7 years

if you close the bank account or matter if you have used the mobile banking service or not.

User's Profile Picture: If customers use our bank's Apps service, the Bank need to retain all the profile pictures uploaded by customers all the time. When customers change the profile picture, the Bank will delete the previous profile picture.

When the Bank terminates the operation of the products or services, the Bank will notify customers via email, SMS, our bank website, announcement etc.. We will delete customers information within a reasonable period of time in accordance with relevant laws and regulations.

IV. Information Security Protection

The Bank is devoted to the commitment of the information security for each customer, to prevent the loss, misuse, unauthorized access or disclosure of customer information.

The Bank will use any security measures at rational safety level to keep customer information safe, such as cryptogram and anonymous disposal.

To prevent customer information leakage, the Bank will keep improving our technical measures to enhance the security of the software installed on customers' devices. For instance, The Bank will encrypt the transaction information to make sure the information transmission is secured.

The Bank has instituted specific criteria, procedures and organization to keep customer information safe. For instance, The Bank controls the authorities of our staffs to access customer information strictly and requests them to obey the security obligation forcibly and carry on the audit.

The Bank will launch the emergent procedure in the case of security issues, such as customer information leakage, to minimize the influence of the event. In the meantime, The Bank will notify customers by sending notifications, such as email, SMS, our bank website, announcement, etc..

V. How the Bank Uses Customer Personal Information

The Bank uses customer personal information with the aim to comply with the laws, regulation, and regulatory provisions, build up, review, maintain and develop the relationship with the customers. The personal information collected may include: the frequency of the Apps usage, crash data, overall usage, performance data and the download source of our bank Apps. The Bank will not combine the information stored in the analysis software with any personal information provided in the Apps.

To provide customers with more accurate, personalized, and convenient services the Bank may conduct comprehensive statistics and analyze customer information. The Bank may provide customers with notifications of marketing activities, commercial electronic information, or advertisements which customers may be interested basing on the aforementioned information. If customers do not wish to receive such information, customers may choose to unsubscribe in accordance with the methods suggested by the Bank.

Note: The Bank will not use information from "Phone Book", "Album" or other APIs that can access user data to build

customer contact database or distribution to third parties, collect information of other Apps installed in customer' s device for other commercial purpose such as analyzing or advertising / marketing. The Bank will not contact customers with the information from “Address Book” or “Album” .

If the Bank uses customer information beyond the scope of the purpose, direct or reasonable used of information collected, the Bank will inform customers and get their consent through online channels before using customer information.

VI Management of Personal Data

i) Manage Personal Information

Management of personal information includes inquiry, amendment, delete of personal information. Unless stipulated by laws, regulations and regulations, customers can inquire personal information related to the Apps service by visiting our branches, customers can submit application at branches to update their personal information. Customers can also inquire their personal information via the Apps. The Bank will provide the online functions for personal information modification in accordance with Hong Kong laws, regulations and regulatory

requirements. The Bank will handle all the requirements of data access and data correction in accordance with the regulations.

Customers can request the Bank to delete their personal information in the following situations:

- 1) If customers consider that the Bank handles their personal information violating the laws, regulations and regulatory requirements.
- 2) If customers consider that the Bank collects and uses their personal information without their permission.
- 3) Customers no longer use the Bank' s products or services, or terminate their accounts.

ii) Scope of Authorization

Customers can inquire the access right via mobile device which customers have authorized the Apps to access the camera, photo album, location, fingerprint / face ID, and also change or revoke the corresponding access right at any time. Refusing to authorize these permissions will prevent customers from using the corresponding functions but will not affect the normal use of other functions in the Apps. Customers can also inquire and modify the settings via Apps which has made previously for

business handling. Before customers modify the settings, the Bank will verify their identity. After customers log in to the Apps, they can proceed with the following operations:

Set up designated Personal Information: Providing the functions of modifying the mobile number, e-mail address, profile picture and other personal information according to the local regulatory regulations.

Login Management: Providing the functions of login-related settings, including enabling or disabling fingerprint / face ID login, gesture password login, modifying login password, setting up gesture password.

ICBC Messaging: Providing the functions of enabling or disabling the push notifications of ICBC Messaging on this device and set up different types of ICBC Messaging. If customers choose to enable the push notification, the system will record their device information.

iii) Account Termination

- 1) Customers may terminate an account or service after they have given 30 days' prior written notice to us or a shorter notice accepted by us, and complied with our reasonable requirements and paid our reasonable fees.
- 2) Customers may close their account(s) by providing their no less than 30 days' prior notice. Under exceptional circumstances (including but not limited to where the account(s) is/are being used or is/are suspected of being used for illegal activities), the Bank may close their account(s) with immediate effect without prior notice.
- 3) Within 14 days (or such longer period as we agree) after the termination of customers' account, they will give us instructions for the delivery (at their risk and subject to our rights) of their property (if any), and pay all reasonable fees and expenses. If customers have not done so, the bank will continue to hold the property at their risk and subject to our rights, but without the obligations, under the "Master Terms and Conditions - Banking Services" of the Bank. No interest will be payable on any credit balance as from the date of termination.
- 4) Termination of an account or a service will not affect accrued rights or subsisting transactions. The Bank may

cancel, close out or complete any outstanding instruction or contract. Clauses 2 (Information), 7 (Payments / delivery), 8.4 (overdue interest), 10 (Limit of our liability), 11 (Your indemnity), 13 (Set-off and lien) and 15 (Evidence) of the “Master Terms and Conditions – Banking Services” of the Bank will survive termination.

iv) Responding to Customers’ Requests

If customers are unable to access, update or delete their information through the above methods, or customers consider that the Bank have obtained or used their information improperly or violated the agreement on their information, customers can directly contact the Bank via our hotline or visit our branches. The Bank will actively response to customers’ requirements within the scope of laws and regulations and regulatory provisions. The Bank will comply with all data access and correction requirements as required by the Ordinance. The Bank may verify customers’ identity before processing their request. The Bank may refuse the requests that are unreasonably repeated, posing risks to the legitimate rights and interests of others, or are impractical.

Despite the above agreement, according to the relevant laws and regulations of Hong Kong and regulatory provisions, the Bank may not be able to response to the request of customers in the following circumstances:

- 1) Related to the personal information controllers implementing the obligations by laws and regulations;
- 2) Related to national security and national defense security directly;
- 3) Related to public safety, public health and major public interests directly;
- 4) Related to criminal investigation, prosecution, trial and execution of judgments directly;
- 5) The personal information controller has sufficient evidence to show that the personal information subject has subjective malice or abuse of the rights;
- 6) In order to protect the life, property and other major legitimate rights and interests of the personal information subject or other individuals, but difficult to obtain customer's own consent;
- 7) Responding to the request of the personal information subject will cause serious damage to the legitimate rights and

interests of the personal information subject or other individuals and organizations;

8) Involving commercial secrets;

9) Other situations required by the competent authorities or regulatory regulations in the country (region) where the Bank is located.

VII. External Disclosure of Information

7.1 Information Disclosure

The Bank will not disclose customer information collected. If the Bank must disclose it to the public, the Bank will inform customers of its purpose, the type of information to be disclose and sensitive information involved possibly, and soliciting customers' consent or authorization by online notice or other means.

7.2 Third Party SDK Services

When customers use the functions or services in ICBC Mobile Banking Apps, the Bank may use the software service kits provided by the third party service provider (referred to "SDK") with corresponding business qualifications and capabilities in

certain circumstances. The third party service provider will collect your necessary information.

Please find the below third parties in specific:

(1) Huawei Push Notification SDK: In order to notify the customers promptly, the Bank adopts Huawei Push Notification SDK. This SDK will collect the unique identification information of the mobile device and the information of the subscription list for APP push notification service.

(2) Xiaomi Push Notification SDK: In order to notify the customers promptly, the Bank adopts Xiaomi Push Notification SDK. This SDK will collect the unique identification information, version of the operating system, language, model, regional setting, system type and network type of the mobile device for APP push notification service.

(3) Baidu Positioning SDK: In order to provide the location related information, the Bank adopts Baidu Positioning SDK. This SDK will collect the unique identification information, latitude and longitude and version of the operating system of the mobile device for positioning services.

(4) Hong Kong TransUnion Limited SDK: In order to facilitate the account opening for Hong Kong customers, the Bank adopts Hong Kong TransUnion Limited SDK. This SDK will collect the

image of the ID card, ID profile picture, short video of the ID card for e-account opening, photo of the face for ID card scanning and Liveness Detection.

VIII. Use of Positioning Information

When customers use other Bank' Apps services, the Bank will collect the following log information in order to ensure customers are using the Bank' s services normally and safely, improve the services and protect the security accurately, the Bank may collect the sensitive information such as location of the customers, which can only be used to provide customers with relevant services only if the Bank obtain customers' consent. Refusing to provide the information will only restrict customers location-related functions, it will not affect customers' normal use of other functions in the Apps.

IX. Information Protection for Minors

The Apps provides financial services to Hong Kong local and overseas users, the products and services are primarily aimed at adults with independent financial capabilities. The Bank do

not collect information on minors without independent financial capacity.

X. Notification and Modification

This Privacy Policy will be updated from time to time in accordance with laws, regulations, regulatory policies and operational requirements. However, without customers' explicit consent, the Bank will not reduce customers' rights that they should have under this Policy. The Bank will post an update on the website or the Apps and notify customers by means of a website announcement or other appropriate means before the effective date.

XI. How to Contact Us

If customers have any questions, comments or suggestions about this Privacy Policy or the personal information, customers can call our service hotline at (852)21895588 or visit our branches for consultation or feedback.