



中国工商银行

INDUSTRIAL AND COMMERCIAL BANK OF CHINA

新加坡分行

SINGAPORE BRANCH

Personal Data Protection Policy (Effective 30 November 2021)

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 2012 (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**”) collects, processes, uses and discloses your Personal Data. This Policy applies to all Personal 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, related companies 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 Representatives collectively, “**we**”, “**us**”) collecting, processing, using and disclosing your Personal Data in the manner set out in this Policy.

1. What is Personal Data

“**Personal Data**” means any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access. Some examples of Personal Data we collect when you interact or bank with us include, but is not limited to: -

- (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 purposes, such as: -

- (a) providing our (including our strategic partners' products/services to you (e.g.: account maintenance, printing of statements) and researching on new products/services;
- (b) assessing and processing your application/ instructions/ requests for any products/services;
- (c) verifying your identity;
- (d) communicating with you (e.g.: updating you with updates/ changes/ suspension/ cessation to any features of our products/services);
- (e) responding to / investigating feedback/ queries/ complaints/ claims/ disputes;
- (f) monitoring products/ services we offer;
- (g) conducting or facilitating the conduct of credit checks or other due diligence checks under any applicable laws, regulations, industry codes and guidelines;
- (h) complying with obligations imposed on us by any credit bureau or credit information sharing platform to which we subscribe;
- (i) creating/ maintaining your credit/ risk profile;
- (j) complying with all applicable laws, regulations, guidelines, directives, court orders from all authorities having jurisdiction over us (including government, tax or law enforcement);
- (k) preventing, investigating, or assisting any law enforcement or other authorities to investigate, any crime or offence (including any attempted crime or offence);
- (l) managing our policies, procedures, operations and infrastructure;
- (m) enforcing our legal rights/ obligations (e.g.: to recover debts due to us);
- (n) allowing us to do reporting (e.g.: financial, regulatory and credit reporting) to the authorities or to ICBC;
- (o) facilitating any proposed or confirmed merger, acquisition or business asset transaction involving any part of the ICBC Group or corporate restructuring process;
- (p) seeking professional/consultant advice (e.g.: legal, tax);
- (q) record keeping (whether in electronic or physical form);
- (r) managing our risks within ICBC Singapore and the ICBC Group, including but not limited to taking adverse action against you;
- (s) promoting, furthering and improving the provision of services by ICBC Singapore or any member of the ICBC Group to you;
- (t) conducting promotions (e.g.: lucky draw, redemption of gifts);
- (u) all other purposes set out in our terms and conditions for the respective products/ services that we provide to you; and
- (v) safety and security.

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 all Personal Data submitted to us (whether of yourself or any third party individual) is complete, accurate, correct and updated at all times for us to provide and continue to provide our service/

product to you or the relevant third party. If you submit Personal Data belonging to any third party, you represent and warrant to us that you have notified and obtained consent from such third party to allow our collection, processing, use or disclosure of their Personal Data in accordance with this Policy. 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 ICBC Singapore and the ICBC Group keep their 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, Authorized Representatives and where applicable to the accounts, product or service you receive: -
- i. recipients and beneficiaries of payments, intermediaries and other banks;
 - ii. third-party providers whom you have authorised to receive your information on accounts held with us 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 icbcsg@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, processing, 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 and promotions 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.
- (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 the condition that they keep your Personal Data confidential and secure, and subject to applicable law: -

- (a) ICBC Group (i.e. 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 or 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. 3rd party websites

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 relevant service/ product. All our rights and remedies are reserved regardless of your withdrawal of consent.

10. Retention

We will cease to retain your Personal Data as soon as it is reasonable to assume that the purpose for the collection of such Personal Data is no longer being served by such retention, and such retention is no longer 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 PDPA) 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 such earlier consents. Your consent is in addition to our rights under all other applicable laws that permit us to collect, process, 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 on this Policy or your Personal Data, or to provide feedback, you can do so by visiting any of our branches, visiting our website or emailing us at icbcsg@sg.icbc.com.cn.

(As at 30 November 2021)