

## **BOCSG's Personal Data Protection Policy (20210924)**

We at Bank of China Limited, Singapore Branch (“**BOCSG**”) take our responsibilities under Singapore’s Personal Data Protection Act (No. 26 of 2012) (the “**PDPA**”) seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Data Protection Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the “**DPO**”) via email at [bocdp@bankofchina.com](mailto:bocdp@bankofchina.com).

### **1. INTRODUCTION TO THE PDPA**

1.1 “**Personal Data**” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, residential address, email address, date of birth, specimen signatures, photographs and video images.

1.2 We will collect your personal data in accordance with the PDPA. We will notify you of the purposes for which your personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless an exception under the law permits us to collect and process your personal data without your consent.

### **2. PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA**

2.1 The personal data which we collect from you may be collected, used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your personal data, including:

- (a) considering and/or processing your application/transaction with us;
- (b) facilitating, processing, dealing with, administering, managing and/or maintaining your relationship with us, including but not limited to handling feedback or complaint;
- (c) providing you with our services and products, as well as services and products provided by other external providers provided through us;
- (d) carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf;
- (e) contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering and/or managing your relationship with us such as but not limited to communicating information to you related to your account/banking facilities/transaction with us;
- (f) carrying out credit checks, due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations or our risk

management procedures that may be required by law or that may have been put in place by us;

- (g) to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether relating to your relationship with us or any other matter arising from your relationship with us, and whether or not there is any suspicion of the aforementioned;
- (h) complying with or as required by any applicable law, governmental or regulatory requirements of any relevant jurisdiction, including meeting the requirements to make disclosure under the requirements of any law binding on us and/or for the purposes of any guidelines issued by regulatory or other authorities, whether in Singapore or elsewhere, with which we are expected to comply;
- (i) complying with or as required by any request or direction of any governmental authority; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities (including but not limited to the Monetary Authority of Singapore, Inland Revenue Authority of Singapore, Insolvency & Public Trustee's Office, Commercial Affairs Department and courts). For the avoidance of doubt, this means that we may/will disclose your personal data to the aforementioned parties upon their request or direction;
- (j) conducting research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve our services and facilities in order to enhance your relationship with us or for your benefit, or to improve any of our products or services for your benefit;
- (k) storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore;
- (l) financial reporting, regulatory reporting, management reporting, risk management (including monitoring risk exposure) audit, record keeping purposes; and
- (m) any other purposes which we notify you of at the time of obtaining your consent. (collectively, the "**Purposes**")

2.2 As the purposes for which we may/will collect, use, disclose or process your personal data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by applicable law.

2.3 In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third party service providers, agents and/or our head office, affiliates or related corporations, and/or other third parties whether sited in Singapore or outside of Singapore, for one or more of the above-stated Purposes. Such third party service providers, agents and/or affiliates or related corporations and/or other third parties would be processing your personal data either on our behalf or otherwise, for one or more of the above-stated Purposes.

### **3. SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

3.1 We respect the confidentiality of the personal data you have provided to us.

- 3.2 In that regard, we will not disclose your personal data to third parties without first obtaining your consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:
- (a) cases in which the disclosure is required or authorized based on the applicable laws and/or regulations such as the Banking Act (Cap. 19);
  - (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
  - (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
  - (d) cases in which the disclosure is necessary for any investigation or proceedings;
  - (e) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorization signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
  - (f) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or
  - (g) where such disclosure without your consent is permitted by the PDPA or by law.

3.3 The instances listed above at paragraph 3.2 are not intended to be exhaustive. For more information on the exceptions, you are encouraged to peruse the First and Second Schedules of the PDPA which is publicly available at <https://sso.agc.gov.sg/>.

3.4 Where we disclose your personal data to third parties with your consent, we will employ our best efforts to require such third parties to protect your personal data.

#### **4. COOKIES**

4.1 Our websites and mobile applications may utilise cookies. Cookies are small text files which are transferred to your computer or mobile when you visit a website or use a mobile application. Cookies collect information about users and their visit to the website or use of the mobile application, such as their Internet protocol (IP) address, how they arrived at the website (for example, through a search engine or a link from another website) and how they navigate within the website or mobile application. We may use cookies and other technologies to facilitate your internet sessions and use of our mobile application, offer you products and/or services according to your preferred settings, track use of our websites and mobile application and to compile statistics about activities carried out on our websites and/or through our mobile application.

4.2 A pixel tag, also known as a web beacon, is an invisible tag placed on certain pages of a website but not on your computer. Pixel tags are usually used in conjunction with cookies and are used to monitor the behaviour of users visiting the website.

4.3 You have the choice to set up your web browser to block cookies, which will in turn disable the pixel tags from monitoring your website visit. You may also remove cookies stored from your computer or mobile device. Please note that when stopping, blocking or disabling cookies and/or pixel tags, might mean that you will not be able to access certain features

and functions in our websites or mobile applications or that some of them may not work as intended.

## **5. REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA**

5.1 You may request to access and/or correct the personal data currently in our possession or control by submitting a written request to us by completing the relevant forms that are available at our main branch or sub-branches.

5.2 For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within 30 days. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested. Note that the PDPA exempts certain types of personal data from being subject to your access request.

5.3 For a request to correct personal data, once we have sufficient information from you to deal with the request, we will:

(a) correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of personal data from being subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request.; and

(b) subject to paragraph 5.4, we will send the corrected personal data to every other organisation to which the personal data was disclosed by BOCSG within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

5.4 Notwithstanding paragraph 5.3(b), we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.

5.5 We will also be charging you a reasonable fee for the handling and processing of your requests to access your personal data. We will provide you with a written estimate of the fee we will be charging. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

## **6. REQUEST TO WITHDRAW CONSENT**

6.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by submitting your written request to us at [bocdp@bankofchina.com](mailto:bocdp@bankofchina.com).

6.2 We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.

6.3 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your existing relationship with us or the contract you have with us may have to be terminated.

## **7. ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA**

7.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by us to make a decision that affects you, or disclosed to another organization. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your failure to update us of any changes in your personal data that you had initially provided us with.

7.2 We will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.

7.3 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

7.4 Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies, and taking appropriate steps to ascertain that the foreign recipient organization of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the Act. This may include us entering into an appropriate contract with the foreign recipient organization dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

## **8. COMPLAINT PROCESS**

8.1 If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.

8.2 Please contact us by way of email with your complaint or grievance to [bocdp@bankofchina.com](mailto:bocdp@bankofchina.com).

8.3 Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our organization to handle. For example, you could insert the subject header as "PDPA Complaint".

8.4 We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

**9. UPDATES ON DATA PROTECTION POLICY**

9.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.

9.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy will be posted on our website and can be viewed at <http://www.bankofchina.com/sg>.

9.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.