



## Standard Chartered Bank (Hong Kong) Limited (the “Bank”)

### Notice to customers and other individuals relating to the Personal Data (Privacy) Ordinance (“Ordinance”) and the Code of Practice on Consumer Credit Data

#### Protecting your personal data

Your personal data is important to us, and we want to make sure you know how we use and protect it. Personal data is information that either identifies you or is about you as an individual. In this privacy notice, we’ll explain how we collect, share, and process your personal data. We’ll also tell you about your rights and how you can exercise them. From time to time, we may also provide you where relevant, with additional privacy information in a separate notice for specific channels, products, services, businesses and activities.

In this privacy notice, “we”, “us” or “our”, refers to the Standard Chartered Group branch, subsidiary or legal entity operating under the Standard Chartered brand you interact with either directly or indirectly that processes your personal data and decides how it is collected and used. Standard Chartered Group means each of, or collectively, Standard Chartered PLC, its subsidiaries and affiliates, including each branch or representative office. Please refer to the ‘How to get in touch’ section of this privacy notice for details of the relevant Standard Chartered Group member(s) providing this privacy notice.

Some of our affiliates’ websites have their own brand identity and their own separate privacy notices to provide relevant information for specific products and services they provide. You should refer to the relevant privacy notices as directed by those affiliates in relation to how they use your personal data. This privacy notice does not apply to third-party websites where our online advertisements are displayed or to linked third-party websites we do not operate or control. These websites should have their own privacy notices, which you can read to understand how they collect and process your personal data and your rights.

We’ll update this privacy notice from time to time. You can find the current version date listed at the end of this privacy notice. If you have any questions or concerns about your personal data, please don’t hesitate to get in touch (you can find our details under ‘How to get in touch’ below).

#### What types of personal data do we collect?

We may collect the following types of personal data about you. In this privacy notice, “You” refers to you as an individual, as relevant if you are:

- a personal banking client;
- a representative of, or an individual directly or indirectly related to or associated with: (i) a company, business or organisation that is our personal banking client; or (ii) a person or a company, business or organisation that has a relationship with our personal banking client; or
- a representative of, or an individual directly or indirectly related to or associated with: (i) a company, business or organisation that is our business or corporate banking client; or (ii) a person or a company, business or organisation that has a relationship with our business or corporate banking client.

In addition, “You” has the same meaning as a “data subject” (defined below).

If you give us someone else’s personal data, you must have their permission and explain to them how we’ll use it.

We may collect the following types of personal data about you, as relevant and permitted or required by applicable law:

- **Identification data** – information that identifies (uniquely or semi uniquely) you. For example, your name, your date of birth, your gender, your user login credentials, your photographs, CCTV and video recordings of you and other identifiers, including official/government identifiers such as national identification number, passport number and tax identification number
- **Contact data** – information that allows addressing, sending or communicating a message to you. For example, your email address, your phone or mobile number and your residential or business address
- **Professional data** – information about your educational or professional background
- **Geo-location data** – information that provides or contains a device’s location. For example, your internet protocol (“IP”) address or your cookies identifier
- **Behavioural data** – analytics information that describes your behavioural characteristics relating to your use of our products and services. For example, usual transactional activities, your browsing behaviour on our websites and how you interact as a user of our products and services, or those provided by third-party organisations, such as our advertising partners and social media platform providers
- **Personal relationship data** – information about associations or close connections between individuals or entities that can determine your identity. For example, spouse or employer relationships
- **Communications data** – information relating to you contained in voice, messaging, email, livechats and other communications we have with you. For example, service requests.
- **Financial and commercial data** – your account and transaction information or information that identifies your financial position and background, status and history as necessary to provide relevant products and services. For example, your debit or credit card details, your source of funds, your financial and credit rating history
- **Biometric data** – information that identifies you physically. For example, facial recognition information, your fingerprint or voice recognition information
- **Health data** – information relating to your health status. For example, disability information relevant to accessibility
- **Criminal convictions, proceedings or allegations data** – information about criminal convictions or related information that we identify in relation to our financial crime prevention obligations, for example, details about any criminal convictions or related information. This includes details of offences or alleged offences or convictions.

We often collect personal data directly from you, but we may also obtain your personal data from other sources as necessary, depending on the relevant products and services that we are providing, including from:

- **People you know** – such as:
  - o parents or guardians of minors. If you are a minor (normally this means if you are under 18 years old, but this might be younger depending on where you live). We will get your parent or guardian’s consent before collecting, using or sharing your personal data
  - o your joint account holders

- o your referees; and
- o other people you appoint to act on your behalf
- **Businesses and other organisations** – such as:
  - o your employer and/or company, business or organisation you represent or is related to you
  - o other financial institutions and financial service providers
  - o strategic referral partners, including business alliance, co-branding partners or other companies or organisations that the Standard Chartered Group cooperates with based on our contractual arrangements or other joint ventures to provide relevant third-party products and services
  - o credit bureaus or credit reference agencies, credit protection providers, rating agencies, debt collection agencies, fraud prevention agencies and organisations (including credit reference agencies approved for participation in the Multiple Credit Reference Agencies Model)
  - o service partners, such as advertising and market research companies and social media platform providers
  - o regulatory and other entities with authority over the Standard Chartered Group, such as tax authorities, law enforcement or authorities imposing financial sanctions
- **Our corporate and business clients** – where you receive the benefit of our services in relation to our contract with the company, business or organisation you interact with. For example, resolving payment disputes with our merchant clients
- **Publicly available resources** – such as online registers or directories or online publications, social media posts and other information that is publicly available
- **Cookies** – when you visit, browse, or use our websites, online banking or mobile applications, we may use cookies to automatically collect certain information from your device. We may use such information, where relevant, for internal analysis and troubleshooting, to recognise you and remember your preferences, to improve the quality of and to personalise our content and to determine the security status of your account. For more information on how we use cookies and how you can control them when visiting our websites, please see our Cookie Policy.

### Why do we collect your personal data?

We collect your personal data so that we can provide our products and services, manage our relationship with our clients and operate our business. This is necessary when you hold your own bank account with us and also when you represent, or are associated with, other individuals, companies, businesses or organisations who bank with us, for example, if you act as a guarantor, employee, shareholder, director, officer or authorised person.

If you have or are associated with more than one account with Standard Chartered Group, we may link all your accounts and personal data to enable us to have an overall picture of our client relationships.

What we use your personal data for is often referred to as our purposes of processing. We do this by prior notification of the purposes of processing, with your consent where required by law, or where otherwise permitted or required by applicable law. We may not be able to offer or provide facilities, products and services if you do not provide us with or do not want us to process the personal data that we consider is necessary and/or is required to meet our legal and regulatory obligations.

### Purposes of Processing

We process your personal data for the following purposes, as necessary to provide relevant products and services, depending on whether you have your own bank account with us or you represent, or are associated with, other individuals, companies, businesses or organisations who bank with us.

### Assessing and providing products and services to our clients

This includes:

- assessing eligibility, merits and/or suitability of products and services offered by us or any member of Standard Chartered Group and process applications for clients; we may retain a record of the application if our eligibility criteria are not met
- assessing your suitability as an individual guarantor
- conducting relevant due diligence and know-your-customer (“KYC”) checks as required by applicable law
- conducting credit checks (whether in respect of an application for, or modification of the terms of our products or services or during regular or special review which normally will take place once or more each year) and financial assessments as required by applicable law and regulations.
- setting credit limits for clients
- obtaining quotations, assisting with applications and interacting with strategic referral partners on behalf of clients for co-branding and other third-party products and services, such as insurance and wealth management products
- opening accounts.

### Managing banking relationships and administering client accounts

This includes:

- establishing, continuing and managing banking relationship and account with us or, where applicable, any member of the Standard Chartered Group
- providing clients with appropriate access to our products and services, such as our online and mobile banking platforms
- operating, providing, reviewing and evaluating facilities, products and services offered by or through us or any member of Standard Chartered Group to fulfil our contractual obligations with clients for facilities, products and services
- effecting and verifying transactions and acting on instructions or requests, such as transferring money between accounts and making payments to third parties for clients
- maintaining up-to-date records of authorised persons and signature lists
- maintaining statements detailing the amount of indebtedness owed to or by you
- administering, for example, credit facilities or loans for clients
- maintaining contact information
- responding to questions or managing any complaints, including monitoring social media conversations and posts to identify conversations,

- sentiments, and complaints about the Standard Chartered Group
- issuing notifications about changes to the terms and conditions of our products and services
- recording our communications for record-keeping and evidential purposes including online messages, email and telephone
- contacting clients relating to the products and services we are providing
- facilitating open banking for clients, including with account information service providers.

### **Operating our business**

This includes:

- managing authentication and user access controls for clients, for example, for online and mobile banking
- audits of our business operations
- creating and maintaining our credit scoring models relating to clients
- conducting relevant credit management activities, which includes maintaining client credit history for present and future reference, updating credit bureaus and credit reference agencies and ensuring ongoing credit worthiness and credit checks
- assisting other credit providers in Hong Kong approved for participation in the Multiple Credit Reference Agencies Model to conduct credit checks and collect debts
- assisting other banks and third parties recover funds that have entered client accounts as a result of erroneous payments
- engaging in business operational management, such as performing administrative tasks relating to the products and services we provide, monitoring and reporting of our financial portfolio, risk management activities, audits and ensuring operation of our communications and processing systems, systems development and testing, business planning and decision-making.

### **Improving our products and services to our clients**

This includes:

- developing, testing and analysing our systems, products and services
- monitoring and recording our communications with you, for example, phone calls, for training and quality purposes
- conducting market research and customer satisfaction surveys
- designing our products and services for your use, for example credit cards
- conducting marketing in relation to our products and services
- managing, monitoring and assessing the performance of any agent, contractor or third-party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to us in connection with the establishment, operation, maintenance or provision of our products and services
- conducting demographic analytics and gathering insights by aggregating data such as behavioural data from the use of our products and services and our applications to provide you with more tailored products and services.

For further information on direct marketing, please refer to 'When do we conduct direct marketing?' section of this privacy notice.

### **Keeping you and our people safe**

This includes:

- conducting identity verification security checks for building access
- using CCTV surveillance recordings at our branches, premises and ATMs for the purposes of preventing and detecting fraud and/or other crimes, such as theft
- investigating and reporting on incidents or emergencies on our properties and premises
- for the security of our systems and networks in order to keep your data safe and confidential
- for other health and safety compliance purposes
- monitoring social media conversations and posts to protect clients from sharing data publicly that could be used for fraud.

### **Detecting, investigating and preventing financial crimes**

This includes:

- meeting or complying with Standard Chartered Group policies, including identifying individuals and performing investigative procedures, measures or arrangements for sharing data and information within the Standard Chartered Group
- any other use of data and information in accordance with any group-wide programmes for compliance with sanction or prevention or detection of money laundering, terrorist financing or other unlawful activities
- conducting identity verification security checks against government and other official centralised databases, as required by law
- monitoring and recording our voice and electronic communications and screening applications and transactions in connection with actual or suspected fraud, financial crime or other criminal activities, for example to detect unusual transaction behaviour
- recording and monitoring voice and electronic communications with us, to the extent permitted by applicable law, to ensure compliance with our legal and regulatory obligations and internal policies
- conducting checks against government and non-government third parties' fraud prevention and other financial crime prevention databases to prevent money laundering, terrorism, fraud and other financial crimes, to protect you, our clients and the integrity of the financial market. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies and may result in others refusing to provide services or employment to you.

### **Complying with applicable laws, regulations and other requirements**

This includes:

- meeting or complying with Standard Chartered Group policies, including identifying individuals and performing investigative procedures, measures or arrangements for sharing data and information within the Standard Chartered Group

- meeting or complying with (contractual or otherwise) any relevant local and foreign law, regulations, rules, directives, judgments or court orders, requests, guidelines, best or recommended practices, government sanctions, embargo, reporting requirements, restrictions, demands from or agreements with any authority (including domestic or foreign tax authorities), court or tribunal, law enforcement agency, or self-regulatory or industry bodies or associations of financial services providers, exchange body in any relevant jurisdiction where the Standard Chartered Group operates
- sharing personal data relating to your personal bank account with a local tax authority in accordance with applicable law or regulations. The local tax authority may share or may require us to share such information with other overseas tax authorities in accordance with applicable law or regulations (for example, tax law and regulations relating to automatic exchange of financial account information). We may need to collect extra information from you for such purpose to comply with applicable law or regulations.

### **Exercising Standard Chartered Group's legal rights and conducting legal proceedings**

This includes:

- tracing and exercising our rights and protecting ourselves against harm to our rights and interests
- retaining records as may be necessary as evidence for any potential litigation or investigation
- recovering debts and arrears
- conducting litigation to enforce our rights or the rights of any other member of the Standard Chartered Group obtaining professional advice
- investigating or making an insurance claim
- responding to any insurance related matter, action or proceeding
- defending or responding to any current or prospective legal, governmental or quasi-governmental, regulatory, or industry bodies or associations related matter, action or proceeding or for establishing, exercising or defending legal rights.

### **Facilitating Standard Chartered Group mergers, acquisitions, and divestments**

This includes:

- evaluating our business and providing continuity of services to you after a transfer of our business as a result of a merger, acquisition, sale or divestment
- enabling an actual or potential assignee of all or any part of our business and/or asset or participant or sub-participant of our rights in respect of the data subject, to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation.

### **When do we conduct direct marketing?**

We may sometimes, and with your consent as required by applicable law, use your personal data in direct marketing. In this connection, please note that:-

- (i) your name, contact details, products and services portfolio information, transaction pattern and behaviour, financial background and demographic data of you held by us from time to time may be used by us in direct marketing;
- (ii) the following classes of services, products and subjects may be marketed:
  - news, offers and promotions about our or other Standard Chartered Group products and services
  - financial, insurance, fiduciary, investment services, credit card, securities, investment, banking and related services and products;
  - reward, loyalty or privileges programmes and related services and products
  - products and services offered by our co-branding partners (the names of such co-branding partners can be found in the application form(s) for the relevant products and services, as the case may be);
  - charitable and/or non-profit making donations, sponsorships and contributions.
- (iii) the above services, products and subjects may be provided or (in the case of donations and contributions) solicited by us and/or:-
  - any member of the Standard Chartered Group;
  - third party financial institutions, insurers, credit card companies, securities and investment, mobile wallets & digital payment services providers;
  - third party reward, loyalty, co-branding or privileges programme providers;
  - co-branding partners of the Bank and/or any member of the Standard Chartered Group (the names of such co-branding partners can be found in the application form(s) for the relevant services and products, as the case may be); and
  - charitable or non-profit making organisations;

In addition to marketing the above services, products and subjects ourselves, we also intend to provide your personal data to all or any of persons described in paragraph (iii) under the same section for use by them in marketing those services, products and subjects, and we require your written consent (which includes an indication of no objection) for that purpose.

We may conduct market research using demographic and insights analytics by aggregating the personal data that we hold about you to provide you with marketing communications, which are more relevant and tailored for you.

We may share limited information about you with social media platform providers we engage with for the purpose of online social media advertising where you have permitted us and the social media platform provider(s) to use cookies that support our marketing on these platforms. For example, to check whether you have an account with social media platform providers, so we can ask them to display more relevant marketing communication messages to you about our products and services or to exclude you from receiving advertisements for our products and services which you already use.

For more information on how we use cookies in relation to marketing, please see our Cookie Policy.

Where we may receive money or other property in return for providing personal data to other persons mentioned above, we are required to inform you prior to doing so collecting your consent or no objection before disclosing your personal data for such marketing purposes.

**You may withdraw your consent or opt-out from receiving such marketing communications or providing to other persons your data for use in direct marketing as described above in accordance with your rights by contacting us using the details in the 'How to get in touch' section below without charge.**

### **When do we use automated decision-making?**

We may use the personal data we collect to conduct data analytics, including profiling and behavioural analysis, to make quicker automated

decisions in our business operations and to evaluate your personal characteristics to predict outcomes and risks. We require that rules followed by such automated systems are designed to make fair and objective decisions. We may use artificial intelligence and machine learning to help improve our communications and client experience, make our business operational processes safer and more efficient and enable us to provide faster responses and improve turnaround time. For example, we may use automated decision-making for the following:

- Client digital onboarding processes - account opening approval processes using electronic Know-Your-Customer (eKYC) checks by verifying the authenticity of scanned identification documents and a photo through biometric facial recognition and liveness check
- Operational efficiency - voicebots for call centre identification verification
- Client engagement - client marketing campaigns and communications to recommend more tailored products and services based on insights from your personal data and your interactions with robo advisors and chatbots.
- Risk management - monitoring of accounts and transactions to detect unusual activities to prevent fraud or money laundering, terrorism and other financial crimes (for example, detecting whether the use of your credit card may be fraudulent) and approval of loan applications and credit decisions based on credit-scoring models.

For further information on your rights in relation to automated decisions that affect you, please refer to the 'What are your personal data protection rights?' section.

Who may we share your personal data with?

We may share your personal data within the Standard Chartered Group. Standard Chartered Group may share your personal data for the purposes of processing as set out in this privacy notice, including with our service providers, our business partners, other third parties and as required by law or requested by any authority. Who these are depends on your interactions with us as an individual.

We limit how, and with whom, we share your personal data, and take steps to ensure your personal data is kept confidential and protected when we share it. We may share your personal data for our purposes of processing with the following, where relevant and allowed by law:

- Other members of the Standard Chartered Group
- Authorised third parties
  - o legal guardians, joint account holders, actual or intended guarantors/sureties, trustees, beneficiaries, executors, or authorised persons of our clients, any actual or potential participants or sub-participants in relation to any of our obligations in respect of any banking agreement, assignees, novatees or transferees (or any officers, employees, agents or advisers of any of them)
  - o any other person you have authorised us by your consent to share your personal data with.
- Third parties that can verify your information
  - o credit bureaus or credit reference agencies (including the operator of any centralised database used by credit reference agencies), credit protection providers, rating agencies, debt collection agencies, fraud prevention agencies and organisations
  - o other non-government third parties that conduct financial crime prevention databases checks to prevent money laundering, terrorism, fraud and other financial crimes.
- Our service partners
  - o professional advisers, such as auditors, legal counsel, conveyancers and asset valuation specialists
  - o insurers or insurance brokers
  - o service providers, such as operational, administrative, data processing and other technology service providers, including anyone engaged or partnered with to analyse and facilitate improvements or enhancements in Standard Chartered Group's operations or provision of products and services
  - o providers of professional services, such as market researchers, forensic investigators and management consultants
  - o advertising companies and social media platform providers
  - o third-party product providers including, for example, securities and investments providers, fund managers and insurance companies
  - o third-party service providers, such as telemarketing and direct sales agents and call centres.
- Strategic referral partners
  - o business alliance, co-branding partners or other companies or organisations that the Standard Chartered Group cooperates with based on contractual arrangements or other joint ventures to provide relevant third-party products and services
  - o charitable and non-profit organisations.
- Other financial services organisations
  - o other financial institutions, such as merchant banks, correspondent banks or national banks
  - o market infrastructure providers and securities clearing providers
  - o payment service providers, including mobile wallet and digital payment service providers, merchants, merchant acquiring companies, credit card companies, payment processors and card association members, payment-initiation and card-based payment instrument service providers such as VISA and Mastercard,
  - o account information service providers
  - o any financial institution and merchant acquiring company with which you have or propose to have dealings.
- Government authorities, law enforcement agencies and others
  - o as required by law or as requested by any authority, which includes any government, quasi-government, regulator, administrative, regulatory or supervisory body, court, tribunal, law enforcement agency, exchange body or domestic or foreign tax authorities, having jurisdiction over any Standard Chartered Group member whether within or outside your jurisdiction and whether or not that Standard Chartered Group member has a relationship with you. self-regulatory or industry bodies or associations of financial services providers in any relevant jurisdiction where the Standard Chartered Group operates.
- Other third parties
  - o the company, business or organisation, as applicable, that you represent or is related to you
  - o third parties in case of a merger, acquisition or divestment: if we transfer (or plan to transfer) or assign any part of our business or assets. If the transaction goes ahead, the interested party may use or disclose your personal information in the same way as set out in this privacy notice, and subsequently notify you of any changes they may make in terms with confidentiality how they process your personal data
  - o any other person under a duty of us, including any other members of the Standard Chartered Group, which has undertaken to keep such



information confidential.

### Where do we transfer personal data?

Your personal data may be processed, kept, stored, shared, transferred or disclosed by us within the Standard Chartered Group or with other third parties\* for the purposes described in this privacy notice. We do this in order to operate effectively, efficiently and securely in facilitating transactions and providing products and services to our clients, to improve and support our processes and business operations and to comply with our legal and regulatory obligations. This may involve processing, keeping, storing, sharing, transferring or disclosing your personal data locally or cross border to other jurisdictions, which may be subject to relevant local practices and laws, rules and regulations including right of access available to the overseas authorities.

\* Please refer to our website ([www.sc.com/hk](http://www.sc.com/hk)) for the list of countries where such parties may be located.

Where recipients of personal data are in jurisdictions that are outside Hong Kong, and local laws may not have similar data protection laws as Hong Kong, we will take all reasonable steps necessary to ensure that your personal data has an appropriate adequate level of protection and safeguards to comply with applicable law, for example, by using Recommended Model Contractual Clauses issued by the Office of the Privacy Commissioner for Personal Data ("PCPD").

### How do we protect your personal data?

We take the privacy and security of your personal data very seriously. To protect your data, we have put in place a range of appropriate technical, physical and organisational measures to safeguard and keep your personal data confidential, for example, by using contracts with appropriate confidentiality, data protection and security terms in our arrangements with third parties. Standard Chartered Group has implemented information security data privacy policies, including incident management and reporting procedures, rules and technical measures to protect personal data and to comply with legal and regulatory requirements. We train and require staff who access your personal data to comply with our data privacy and security standards. We require our service providers, or other third parties we engage with and to whom we disclose your personal data to implement similar confidentiality, data privacy and security standards and measures when they handle, access or process your personal data.

### How long do we keep your personal data?

For the purposes described in this privacy notice, we keep your personal data for business operational or legal reasons while you engage with us and may retain your personal data for a period of time afterwards, depending on the type of personal data, in accordance with our data retention policy standards and as required by applicable law or regulations. We will take steps to delete, anonymise, destroy and/or stop using personal data when we no longer need it.

### What are your personal data protection rights?

We respect your personal data, and you have the following rights about how we use your information:

- **Your right to access your data:** You have the right to check whether we hold data about you and request a copy of the data
- **Your right to correct your data:** If your personal details have changed, or you believe we have incorrect or out of date information about you, you can ask us to update it
- **Your right to change or withdraw consent:** We may sometimes ask for your consent to process your personal data. If you change your mind, let us know. However, we may not be able to provide our products and services or engage with you without certain personal data
- **Your right to withdraw from direct marketing:** You can withdraw your consent or object to receiving invitations to surveys and marketing communications at any time.

We will respond to requests to exercise your personal data rights in line with applicable law. We may ask you to verify your identity before processing your request. If you have any questions about your rights, please contact us using the details below.

### How to get in touch

The following Standard Chartered Group companies act as the data user (sometimes known as controller in other jurisdictions) responsible for processing your personal data in Hong Kong:

Standard Chartered Bank (Hong Kong) Limited

The person to whom requests for access to or correction of data held by us, or for information regarding our data policies and practices and kinds of data held by us are to be addressed is as follows:

The Data Protection Officer  
Standard Chartered Bank (Hong Kong) Limited  
GPO Box 21  
Hong Kong

In accordance with the terms of the Ordinance, we may charge a reasonable fee for the processing of any data access request. If you have any questions about this privacy notice or would like to exercise any of your personal data protection rights, please do not hesitate to contact either your relationship manager or our designated hotline +852 2886 6023.

### Got a complaint?

If you have any concerns or complaints about how we're using your personal data, please talk to us. You can contact the branch or your relationship manager or get in touch with our Data Protection Officer. You can also contact the Office of the Privacy Commissioner for Personal Data (PCPD) at <https://www.pcpd.org.hk>.

### Cookies

Please see our separate Cookie Policy.

In this document, unless inconsistent with the context or otherwise specified, the following words shall have the following meanings: -

**account(s)** means, for each facility, service or product which we may from time to time make available to the data subjects, the account that is, opened and/or maintained in respect of it from time to time.

**accountholder(s)** means holder(s) of an account, which includes joint accountholder(s) in case there is more than one holder for an account.

**data subject(s)** has the meaning given to it in the Ordinance and includes applicants or accountholders for Facilities, Products and Services, customers, security providers, guarantors, referees, corporate officers and managers, (e.g. authorized signatories, contact persons, company secretary, directors, shareholders, beneficial owners of a corporate), beneficiaries, suppliers, agents, contractors, service providers and other contractual counterparties and any third party transacting with or through us.

**disclose, disclosing or disclosure**, in relation to personal data, includes disclose or disclosing information inferred from the data.

**Hong Kong** means the Hong Kong Special Administrative Region.

**in any capacity** means whether as a borrower, mortgagor or guarantor and whether in the data subject's sole name or joint names with others.

**mortgage count** means the number of mortgage loans held by the data subject (in any capacity) with credit providers in Hong Kong from time to time.

### Other Terms and Conditions

There may be specific terms and conditions in our banking and product agreements that govern the collection, use and disclosure of your personal data. Such other terms and conditions must be read in conjunction with this privacy notice.

In the case of discrepancies between the English and Chinese versions of this privacy notice, the English version shall apply and prevail.

This privacy notice was updated on 26 November, 2023.

### APPENDIX 1: Personal Data (Privacy) Ordinance Code of Practice on Consumer Credit Data

If you apply for, have or have had a loan (including a mortgage) with us, we may provide your personal data to credit reference agencies approved for participation in the Multiple Credit Reference Agencies Model, or in case of default, debt collection agencies. The credit reference agencies will use it to compile a count of mortgages held by you with credit providers which will be added into centralised consumer credit databases shared between credit providers, to help credit providers assess whether to provide you with credit and collect debts.

With respect to data in connection with mortgages applied by a data subject (in any capacity) on or after 1 April 2011, the following data relating to the data subject (including any updated data of any of the following data from time to time) may be provided by us, on our own behalf and/or as agent, to credit reference agencies:

- full name;
- capacity in respect of each mortgage (as borrower, mortgagor or guarantor, and whether in the data subject's sole name or in joint names with others);
- Hong Kong Identity Card Number or travel document number;
- date of birth;
- correspondence address;
- mortgage account number in respect of each mortgage;
- type of the facility in respect of each mortgage;
- mortgage account status in respect of each mortgage (e.g. active, closed, write-off (other than due to a bankruptcy order), write-off due to a bankruptcy order); and
- if any, mortgage account closed date in respect of each mortgage.

Credit reference agencies will use the above data supplied by us for the purposes of compiling a count of the number of mortgages from time to time held by the data subject with credit providers, as borrower, mortgagor or guarantor respectively and whether in the data subject's sole name or in joint names with others, for sharing in the consumer credit databases of credit reference agencies by credit providers (subject to the requirements of the Code of Practice on Consumer Credit Data approved and issued under the Ordinance).

We may from time to time access the mortgage count held by the credit reference agency(ies) in the course of:

- considering mortgage loan application(s) made by the data subject (in any capacity) from time to time;
- reviewing any credit facility (including mortgage loan) granted or to be granted to the data subject (in any capacity) which is in default for a period of more than 60 days with a view to putting in place any debt restructuring, rescheduling or other modification of the terms of such credit facility by us;
- reviewing any credit facility (including mortgage loan) granted or to be granted to the data subject (in any capacity), where there is in place any debt restructuring, rescheduling or other modification of the terms of such credit facility between us and the data subject consequent upon a default in the repayment of such credit facility for implementing such arrangement;
- reviewing any credit facility (including mortgage loan) granted or to be granted to the data subject (in any capacity), with a view to putting in place any debt restructuring, rescheduling or other modification of the terms of any credit facility initiated by the request of the data subject; and/or
- reviewing, evaluating and modifying terms of any credit facility (including mortgage loan) granted or to be granted to the data subject (in any capacity) from time to time, and reviewing the same with the data subject.

We may from time to time access the mortgage count held by the credit reference agency(ies) in the course of (after 31 March 2013):

- reviewing and renewing mortgage loans granted or to be granted to the data subject (in any capacity); and/or
- considering the application for credit facility (other than mortgage loan) by the data subject (in any capacity other than mortgagor) and/or reviewing or renewing any facility (other than mortgage loan) granted or to be granted to the data subject (in any capacity other than mortgagor), in each case where such facility is in an amount not less than such level or to be determined by a mechanism as prescribed or approved by PCPD from time to time.

In the event of any default of payment relating to an account, unless the amount in default is fully repaid or written off (other than due to a bankruptcy order) before the expiry of 60 days from the date such default occurred, the account repayment data (as defined above) may be retained by credit reference agencies until the expiry of five years from the date of final settlement of the amount in default.

In the event any amount in an account is written-off due to a bankruptcy order being made against a data subject, the account repayment data (as defined above) may be retained by credit reference agencies, regardless of whether the account repayment data reveal any default of payment lasting in excess of 60 days, until the expiry of five years from the date of final settlement of the amount in default or the expiry of five years from the date of discharge from a bankruptcy as notified by the data subject with evidence to the credit reference agency(ies), whichever is earlier.

Without limiting the generality of the foregoing, we may from time to time access the personal and account information or records of a data subject held by the credit reference agency(ies) for the purpose of reviewing any of the following matters in relation to the existing credit facilities granted to a data subject or a third party whose obligations are guaranteed by a data subject:

- an increase in the credit amount;

- the curtailing of credit (including the cancellation of credit or a decrease in the credit amount); and
- the putting in place or the implementation of a scheme of arrangement with the data subject or the third party.

We may have obtained credit report(s) on a data subject from credit reference agency(ies) in considering any application for credit or modification of terms of the credit. In the event a data subject wishes to access the credit report(s), we shall advise the contact details of the relevant credit reference agency(ies).

Under and in accordance with the terms of the Ordinance and the Code of Practice on Consumer Credit Data, you have the following additional rights:

- to ascertain from us our policies and procedures in relation to personal data and to be informed of the kind of personal data held by us and/or you have access to;
- to be informed on request which items of data are routinely disclosed to credit reference agencies or debt collection agencies, and be provided with further information to enable the making of access or correction requests to the relevant credit reference agency(ies) or debt collection agency(ies); and
- in relation to any account data (including, for the avoidance of doubt, any account repayment data) which has been provided by us to a credit reference agency, to instruct us, upon termination of the account by full repayment, to make a request to the credit reference agency to delete such account data from its database, as long as the instruction is given within five years of termination and at no time was there any default of payment in relation to the account, lasting in excess of 60 days within five years immediately before account termination. Account repayment data includes amount last due, amount of payment made during the last reporting period (being a period not exceeding 31 days immediately preceding the last contribution of account data by us to the credit reference agency), remaining available credit or outstanding balance and default data (being amount past due and number of days past due, date of settlement of amount past due, and date of final settlement of amount in default lasting in excess of 60 days (if any)).

Contact us if you would like further details about data which is routinely disclosed to credit reference agencies or debt collection agencies, as well as information on how to make data access or correction requests to these agencies.

We will respond to requests to exercise your rights in relation to personal data in line with applicable laws. You can exercise your rights by contacting us as detailed in the 'How do you Contact Us?' section of this privacy notice.

## **APPENDIX 2 : Transfer of Personal Data Using Application Programming Interface (API)**

We may, in accordance with the data subject's instructions to us or third-party service providers engaged by the data subject, transfer data subject's data to third party service providers using our API for the purposes notified to the data subject by us or third-party service providers and/or as consented to by the data subject in accordance with the Ordinance.

## **APPENDIX 3 : China Personal Information Protection Law (PIPL)**

Insofar as the Personal Information Protection Law of the People's Republic of China ("PIPL") is applicable to our process and/or use of your data, this PIPL Appendix supplements the Hong Kong privacy notice/PICS

### **Sensitive Personal Information**

Sensitive personal information refers to the personal information that is likely to result in damage to the personal dignity of any natural person or damage to his or her personal or property safety once disclosed or illegally used, including such information as biometric identification, religious belief, specific identity, medical health, financial account and whereabouts and tracks, as well as the personal information of minors under the age of fourteen. We will process your sensitive personal information only when there is a specific purpose, when it is of necessity, and under the circumstance where strict protective measures are taken. Insofar as the PIPL is applicable to our process and/or use of your data, such sensitive personal data will be processed with your separate consent.

### **Sharing Personal Information**

To the extent required under the PIPL, we will, prior to sharing your personal information with third parties, notify you of the name and contact details of the recipients, the purposes and means of processing and provision of your personal data, and the types of personal information to be provided and shared, and obtain your separate consent to the sharing of your personal information. The foregoing data recipients will use the personal information to the extent necessary for the specific purposes set out in this privacy notice and store the personal data for minimum length of time required to fulfil the purposes, or insofar as the PIPL is applicable to our process and/or use of your data, in accordance with the PIPL.

### **Your Additional Rights Under PIPL**

Insofar as the PIPL is applicable to our process and/or use of your personal information, you have the following additional rights:

- to request us to delete your personal information;
- to object to certain uses of your personal information;
- to request an explanation of the rules governing the processing of your personal data;
- to ask that we transfer personal information that you have provided to us to a third party of your choice under the circumstances provided under the PIP;
- to withdraw any consent for the collection, processing or transfer of your personal data (you should note that withdrawal of your consent may result in us being unable to open or continue accounts or establish or continue banking facilities or provide banking services); and
- In some services, we may make decisions based solely on non-human and automated decision-making mechanisms, including information systems, algorithms, etc. If these decisions significantly affect your legal rights, you have the right to request an explanation from us, and we will also provide appropriate remedies.

Standard Chartered Bank (Hong Kong) Limited

Last Updated in November 2023





## 渣打銀行(香港)有限公司(「本行」) 關於《個人資料(私隱)條例》(「條例」)及《個人信貸資料實務守則》 致客戶及其他個別人士的通知

### 保護閣下的個人資料

閣下的個人資料對我們而言非常重要，我們希望確保閣下了解我們如何使用及保護閣下的個人資料。個人資料是能夠識別閣下的身分或與閣下個人身分相關的資料。本私隱通告將說明我們如何收集、共享及處理閣下的個人資料。我們還會向閣下告知閣下享有的權利及如何行使該等權利。我們亦可能不時在相關情況下，在針對特定渠道、產品、服務、業務及活動單獨作出的通告中向閣下提供額外的私隱資訊。

在本私隱通告中，「本行」、「我們」或「我們的」指直接或間接與閣下往來、處理閣下的個人資料並決定如何收集和使用該等資料的以渣打品牌營運的渣打集團分行、附屬公司或法律實體。渣打集團單指或合指Standard Chartered PLC、其附屬公司和附屬公司，包括各分行或代表處。有關提供本私隱通告的渣打集團相關成員之詳情，請參閱本私隱通告「如何聯絡我們」一節。

我們若干聯屬公司的網站上有其自己的品牌標識及其單獨的私隱通告，就其提供的特定產品及服務提供相關資訊。關於該等聯屬公司如何使用閣下的個人資料，閣下應參閱其指定的相關私隱通告。本私隱通告不適用於展示我們在線廣告的第三方網站或並非由我們營運或控制的第三方連結網站。該等網站應當有其自己的私隱通告，閣下可閱讀該等通告以了解該等第三方網站如何收集及處理閣下的個人資料及閣下享有何等權利。

我們將不時更新本私隱通告。閣下可在本私隱通告末尾處找到當前版本的更新日期。若閣下對自身的個人資料有任何問題或疑慮，請隨時與我們聯絡（我們的詳細聯絡方式請參見下文「如何聯絡我們」一節）。

### 我們收集哪些類別的個人資料？

我們會收集有關閣下的下列類別的個人資料。若閣下屬於下列人士，則在本私隱通告中，「閣下」指閣下個人，以相關者為準：

- 個人銀行業務客戶；
- 以下人士或公司的代表，或與以下人士或公司直接或間接相關或有關聯的個人：(i) 屬於本行個人銀行業務客戶的公司、企業或組織；或(ii) 與本行個人銀行業務客戶有關係的個人或公司、企業或組織；或
- 以下人士或公司的代表，或與以下人士或公司直接或間接相關或有關聯的個人：(i) 屬於本行商業或企業銀行業務客戶的公司、企業或組織；或(ii) 與本行的商業或企業銀行業務客戶有關係的個人或公司、企業或組織。

此外，「閣下」與「資料當事人」（其定義如下）具有相同意義。

若閣下將他人的個人資料提供予我們，閣下必須徵得該等他人的許可，並向其說明我們將如何使用其個人資料。

在適用法律允許或要求的相關情況下，我們可能會收集以下類別與閣下有關的個人資料：

- **識別資料** - 能夠（唯一或半唯一）識別閣下的資料。例如，閣下的姓名、出生日期、性別、用戶登錄憑證、閣下的照片、閣下的閉路電視和錄影記錄以及其他識別信息，包括官方/政府識別信息，如國民身分證號碼、護照號碼和稅號
- **聯絡資料** - 可用於向閣下發送或傳達訊息的資訊。例如，閣下的電郵地址、閣下的電話或手機號碼及閣下的住址或公司地址
- **專業資料** - 有關閣下的教育或專業背景的資訊
- **地理位置資料** - 提供或包含設備位置的資訊。例如，閣下的互聯網協議（「IP」）地址或閣下的 cookie 標識編碼
- **行為資料** - 描述閣下使用我們產品及服務之行為特徵的分析資訊。例如，慣常的交易活動，閣下在我們網站上的瀏覽行為，及閣下作為我們產品及服務的用戶或第三方組織（如我們的廣告合作夥伴和社交媒體平台提供商）提供的產品及服務的用戶之互動方式
- **個人關係資料** - 有關個人或實體之間的關聯或密切聯繫並可用於確定閣下身分的資訊。例如，配偶或僱主關係
- **通訊資料** - 我們與閣下進行的語音、訊息、電郵、即時聊天和其他通訊中包含的與閣下相關的資訊。例如，服務請求
- **財務和商業資料** - 閣下的帳戶和交易資訊，或為提供相關產品及服務所需的可識別閣下的財務狀況及背景、狀況和歷史記錄的資訊。例如，閣下的扣帳卡或信用卡詳情、閣下的資金來源、閣下的財務和信用評級記錄
- **生物識別資料** - 可識別閣下身體的資訊。例如，面部識別資訊、閣下的指紋或聲音識別資訊
- **健康資料** - 有關閣下健康狀況的資訊。例如，與無障礙環境相關的殘疾資訊
- **刑事定罪、訴訟或指控資料** - 我們在履行金融犯罪預防義務時發現的刑事定罪或相關資訊，例如，任何刑事定罪或相關資訊之詳情。這包括犯罪或指控犯罪或定罪之詳情

我們經常直接向閣下收集個人資料，但亦可能依我們提供的相關產品及服務，在必要時自其他來源獲取閣下的個人資料，包括以下來源：

- **閣下認識之人** - 例如：
  - 未成年人的父母或監護人。若閣下是未成年人（這通常指閣下未滿18周歲，但亦可能是更小的年齡，具體視閣下的居住地而定）。在收集、使用或共享閣下的個人資料之前，我們會徵得閣下父母或監護人的同意。
  - 閣下的聯名戶口持有人

- 閣下的轉介人；及
- 閣下指定代表閣下行事的其他人
- **企業和其他組織** - 例如：
  - 閣下的僱主及/或閣下所代表的或與閣下有關的公司、企業或組織
  - 其他金融機構和金融服務提供商
  - 戰略轉介合作夥伴，包括業務聯盟、聯合品牌合作夥伴或渣打集團根據我們的合約安排或其他聯營安排與之合作提供相關第三方產品及服務的其他公司或組織
  - 征信機構或信貸資料服務機構、信貸保護提供商、評級機構、追討欠款公司、防欺詐機構和組織（包括獲准參與「多家個人信貸資料服務機構營運模式」的信貸資料服務機構）
  - 服務合作夥伴，如廣告和市場調查公司及社交媒體平台提供商
  - 對渣打集團擁有權力的監管實體和其他實體，如稅務機關、執法機關或實施金融制裁的機關
- **我們的公司和企業客戶** - 閣下因與閣下有互動的公司、企業或組織與我們簽訂的合約而獲益於我們的服務。例如，解決與我們商戶客戶的支付糾紛
- **公眾可獲得的資源** - 例如在線登記冊或目錄或在線出版物、社交媒體發帖和其他可供公眾取閱的資訊
- **Cookie** - 當閣下訪問、瀏覽或使用我們的網站、網上銀行或移動應用程序時，我們可能會使用Cookie自動從閣下的設備收集某些資料。在相關情況下，我們可能會將此類資料用於內部分析和故障排除、識別閣下的身分並記住閣下的偏好、提高我們內容的質量並使之個性化，以及確定閣下帳戶的安全狀態。有關我們如何使用Cookie及閣下在訪問我們的網站時如何控制Cookie的更多資訊，請參閱我們的Cookie政策。

### 我們為何收集閣下的個人資料？

我們收集閣下的個人資料是為了提供我們的產品及服務，管理我們與客戶之間的關係及經營我們的業務。當閣下在本行持有自己的銀行帳戶時，及當閣下代表與本行有業務往來的其他個人、公司、企業或組織，或與他們有關聯時，例如，當閣下作為擔保人、僱員、股東、董事、高級人員或獲授權人行事時，我們即有必要收集閣下的個人資料。

若閣下在渣打集團持有一個以上帳戶或與一個以上帳戶有關聯，我們可能會將閣下的所有帳戶與個人資料聯繫起來，以便我們全面了解我們與客戶之間的關係。

我們使用閣下個人資料的目的通常稱為處理目的。我們會事先將處理目的告知閣下，在法律要求的情況下徵得閣下的同意後進行處理，或在適用法律允許或要求的情況下進行處理。若閣下不向我們提供或不希望我們處理為履行我們的法律和監管義務之目的我們認為必要的及/或所需的個人資料，我們可能無法提供融通、產品及服務。

### 處理目的

在為提供相關產品及服務而有必要時，我們會為下列目的處理閣下的個人資料，具體取決於閣下是在本行持有自己的銀行帳戶，或是代表與本行有業務往來的其他個人、公司、企業或組織或者與他們有關聯。

### 評估我們的客戶並向其提供產品及服務

這包括：

- 評估我們或渣打集團任何成員提供的產品及服務的獲取資格、優點及/或適合性，並處理客戶申請；若我們的資格標準未獲滿足，我們可保留申請以作記錄
- 評估閣下是否適合作為個人擔保人
- 根據適用法律的要求，進行相關的盡職調查和「了解你的客戶」（「KYC」）審核
- 根據適用法律及規例的要求，進行信貸審查（無論是在申請我們的產品或服務時或在修改我們的產品或服務條款時，還是在通常每年進行一次或多次的定期或特別審查期間）和財務評估
- 為客戶設定信貸限額
- 代表客戶就聯合品牌及其他第三方產品及服務（如保險和理財產品）獲取報價、協助申請並與戰略轉介合作夥伴互動
- 開立帳戶

### 管理銀行業務關係及管理客戶帳戶

這包括：

- 建立、延續及管理與我們或渣打集團任何成員（如適用）的銀行業務關係和帳戶
- 為客戶提供存取我們產品及服務的適當途徑，例如我們的網上銀行及手機銀行平台
- 營運、提供、審核及評估由我們或渣打集團任何成員提供的或透過我們或渣打集團任何成員提供的融通、產品及服務，以履行我們就融通、產品及服務對客戶負有的合約義務
- 執行及核實交易，並根據指示或要求行事，例如為客戶在帳戶間轉帳及向第三方支付款
- 維持最新的獲授權人記錄和簽字名單
- 保存詳細記錄對閣下所欠或由閣下所負債款額的對帳單
- 為客戶管理（舉例而言）信貸融通或貸款等
- 保存聯絡資料

- 答覆問題或管理任何投訴，包括監控社交媒體對話及發帖，以發現有關渣打集團的對話、情緒和投訴
- 發佈有關我們產品及服務之條款及條件變更的通知
- 為保存記錄和證據之目的記錄我們的通訊，包括在線訊息、電郵及電話
- 就我們提供的產品及服務聯絡客戶
- 為客戶提供開放銀行業務之便利，包括與帳戶資料服務提供商合作。

### 經營我們的業務

這包括：

- 為客戶管理身分驗證和用戶訪問控制，例如網上銀行和手機銀行
- 對我們業務營運進行審核
- 創建及維持我們有關客戶的信貸評分模型
- 開展相關的信貸管理活動，包括保存客戶信貸記錄供現時及將來備查，向征信機構及信貸資料服務機構提供最新資訊，並確保持續的信貸能力及信貸審查
- 協助香港獲准參與「多家個人信貸資料服務機構營運模式」的其他信貸資料提供商進行信貸審查及追討欠款
- 協助其他銀行及第三方追回因錯誤的支付而進入客戶帳戶的資金
- 進行業務營運管理，例如執行與我們提供的產品及服務有關的管理任務、監控及報告我們的金融投資組合、風險管理活動、審核及確保我們的通訊和處理系統的運行、系統開發及測試、業務規劃及決策。

### 改進我們為客戶提供的產品及服務

這包括：

- 開發、測試及分析我們的系統、產品及服務
- 為培訓及質量目的，監控及記錄我們與閣下的通訊，例如電話溝通
- 進行市場調查及客戶滿意度問卷
- 設計我們的產品及服務供閣下使用，例如信用卡
- 促銷我們的產品及服務
- 管理、監控及評估就我們產品及服務的建立、營運、維護或提供為我們提供行政、電信、計算機、支付或證券結算或其他服務的任何代理人、承包商或第三方服務提供商的業績
- 透過匯總數據（例如使用我們的產品、服務及應用程序的行為數據）進行人口分析並收集見解，從而為閣下提供更加量身定制的產品及服務。

有關直接促銷的更多資訊，請參閱本私隱通告中「我們何時進行直接促銷？」一節。

### 確保閣下及我們員工的安全

這包括：

- 對出入樓宇進行身分驗證安全檢查
- 在我們的分行、營業場所和自動櫃員機所在之處使用閉路電視監控記錄，以預防和偵查欺詐及/或其他罪行，如盜竊
- 調查及報告在我們的物業和營業場所發生的事件或緊急情況
- 保證我們系統及網絡的安全性，以確保閣下資料的安全性及保密性
- 用於其他健康及安全合規目的
- 監控社交媒體對話及發帖，旨在保護客戶以免其公開分享可能被用於欺詐的資料。

### 偵查、調查及預防金融犯罪

這包括：

- 符合或遵守渣打集團政策，包括為在渣打集團內部共享數據和資料進行個人身分識別及執行調查程序、措施或安排
- 根據整個集團範圍內實施的任何計劃對數據和資料進行任何其他使用，以遵守制裁或防止或偵查洗錢、恐怖分子資金募集或其他非法活動
- 根據法律要求，基於政府和其他官方中央資料庫進行身分驗證安全檢查
- 監控和記錄我們的語音和電子通訊，篩查與實際或可疑的欺詐、金融罪行或其他犯罪活動有關的申請和交易，例如檢測異常交易行為
- 在適用法律允許的範圍內，記錄和監控與我們的語音和電子通訊，以確保遵守我們的法律和監管義務及內部政策
- 基於政府及非政府第三方的防欺詐和其他金融犯罪預防資料庫進行核查，以防止洗錢、恐怖主義、欺詐和其他金融犯罪，從而保護閣下、我們的客戶及良性金融市場。防欺詐機構將保留任何欺詐或洗錢風險記錄，並可能導致他人拒絕向閣下提供服務或僱傭。

### 遵守適用法律、法規和其他要求

這包括：



- 符合或遵守渣打集團政策，包括為在渣打集團內部共享數據和資料進行個人身分識別及執行調查程序、措施或安排
- 符合或遵守（以合約或其他方式）渣打集團營運所在的任何相關司法管轄區的任何機關（包括國內或國外稅務機關）、法院或法庭、執法機關或金融服務提供者的自律機構或行業機構或協會、交易所機構的任何相關本地和外國法律、規例、規則、指令、判決或法院命令、要求、指引、最佳或推薦作業方法、政府制裁、禁運、報告要求、限制、索求或與之達成的協議
- 根據適用法律或法規，與當地稅務機關共享與閣下的個人銀行帳戶相關的個人資料。當地稅務機關可能會根據適用法律或規例（例如，與自動交換金融帳戶資料相關的稅務法律和規例）與其他海外稅務機關共享或要求我們與其他海外稅務機關共享此類資料。為此目的，我們可能需要向閣下收集額外資料，以遵守適用法律或規例。

### 行使渣打集團的合法權利及進行法律程序

這包括：

- 追蹤損害我們權益的行為，及行使我們的權利，保護我們的權益不受損害
- 保留必要的記錄，作為任何潛在訴訟或調查的證據
- 追討債務和欠款
- 進行訴訟以強制執行我們的權利或獲得專業建議的渣打集團任何其他成員的權利
- 調查或提出保險申索
- 對任何與保險有關的事項、行動或程序作出回應
- 就任何現時或未來的法律、政府或半官方、監管或行業機構或協會的相關事項、行動或程序進行抗辯或答辯，或確立、行使或維護合法權利。

### 協助渣打集團的合併、收購和資產剝離

這包括：

- 在因合併、收購、出售或資產剝離而轉讓我們的業務後，評估我們的業務，並持續為閣下提供服務
- 使我們全部或任何部分業務及/或資產的實際或潛在受讓人，或我們與資料當事人有關的權利的參與者或次級參與者，能夠評估擬作為轉讓、參與或次級參與之標的交易。

### 我們何時進行直接促銷？

我們有時會在根據適用法律的要求徵得閣下同意的情況下，將閣下的個人資料用於直接促銷。在這方面，請注意：

- (i) 我們可能將我們不時掌握的閣下的姓名、聯絡方式、產品及服務組合資料、交易模式和行為、財務背景、及人口統計數據用於直接促銷；
- (ii) 以下類別的服務、產品及標的可被促銷：
  - 有關我們產品及服務或渣打集團其他產品及服務的消息、優惠及促銷活動
  - 金融、保險、信託、投資服務、信用卡、證券、投資、銀行及相關服務和產品；
  - 獎勵、忠誠度或特權計劃及相關服務和產品
  - 我們的聯合品牌合作夥伴所提供的產品及服務（該等聯合品牌合作夥伴的名稱請參見相關產品及服務的申請書，視情況而定）
  - 慈善及/或非牟利捐贈、贊助及捐款。
- (iii) 上述服務、產品及標的之提供者或（在捐贈和捐款的情況下）募集者為我們及/或：
  - 渣打集團的任何成員；
  - 第三方金融機構、保險公司、信用卡公司、證券和投資、流動錢包及數碼支付服務提供商；
  - 第三方獎勵、忠誠度、聯合品牌或特權計劃提供商；
  - 本行及/或渣打集團任何成員的聯合品牌合作夥伴（該等聯合品牌合作夥伴的名稱請參見相關服務及產品的申請書，視情況而定）；及
  - 慈善或非牟利組織；

除我們自行促銷上述服務、產品和標的外，我們亦有意將閣下的個人資料提供予本節第(iii)段所述的所有或任何人士，供其用於促銷該等服務、產品和標的，為此目的，我們需要徵得閣下的書面同意（包括表示不反對）。

我們可透過匯總我們所持有的關於閣下的個人資料，利用人口統計學及見解分析進行市場研究，從而為閣下提供更相關、更適合閣下的促銷通訊。

在閣下允許我們和社交媒體平台提供商使用Cookie支持我們在該等平台上進行促銷的情況下，我們可為在社交媒體上發佈在線廣告之目的，與我們合作的社交媒體平台提供商共享有關閣下有限的資料。例如，核查閣下是否擁有社交媒體平台提供商的帳戶，以便我們能夠要求他們向閣下展示更多有關我們產品及服務的相關促銷溝通訊息，或者避免閣下收到閣下已在使用的我們產品及服務的廣告。

有關我們如何在促銷中使用Cookie的更多資訊，請參閱我們的Cookie政策。

若我們向上述其他人士提供個人資料時會收到金錢或其他財產作為回報，則我們在披露閣下的個人資料用於此類促銷目的之前必須事先通知閣下，並徵得閣下的同意或表示不反對。

閣下可按下文「如何聯絡我們」一節中的詳細方式與我們聯絡，根據閣下的權利，撤回閣下的同意，或者選擇不接收此類促銷通訊或不向其他人提供閣下的資料用於上述直接促銷，該等操作概不收費。

## 我們何時使用自動決策？

我們可能使用我們收集的個人資料進行數據分析，包括剖析和行為分析，以便在業務營運中更快地做出自動決策，及評估閣下的個人特徵以預測結果和風險。我們要求此類自動系統所遵循的規則旨在能夠做出合理客觀的決策。我們可使用人工智能和機器學習技術來幫助我們改進溝通及客戶體驗，使我們的業務營運流程更安全、更高效，並使我們能夠提供更快的回應和改善回覆所需時間。例如，我們可能在以下方面使用自動決策：

- 客戶數碼引導流程 - 透過生物面部識別和活躍狀態檢查驗證掃描身分證件和照片的真實性，使用電子「了解你的客戶」（eKYC）審核進行開戶審批流程
- 營運效率 - 用於呼叫中心身分驗證的語音機器人
- 客戶參與 - 客戶促銷活動及溝通，基於對閣下個人資料的洞察及閣下與機器人顧問和聊天機器人的互動，推薦更多量身定制的產品及服務
- 風險管理 - 監控帳戶及交易以發現異常活動，防止欺詐或洗錢、恐怖主義和其他金融犯罪（例如，檢測閣下的信用卡是否有欺詐性使用），根據信貸評分模型批准貸款申請及作出信貸決定。

如需進一步的資訊以了解在影響到閣下的自動決策方面閣下享有何等權利，請參閱「閣下享有何等個人資料保護權利？」一節

## 我們會與誰共享閣下的個人資料？

我們可在渣打集團內部共享閣下的個人資料。渣打集團可為本私隱通告中所述的處理目的共享閣下的個人資料，包括與我們的服務提供商、我們的業務合作夥伴、其他第三方共享，以及根據法律的規定或任何機構的要求共享，具體取決於閣下作為個人與我們互動的情況而定。

我們會對共享閣下個人資料的方式和對象加以限制，並採取措施確保閣下的個人資料在共享時得到保密和保護。在相關且法律允許的情況下，我們可為我們的處理目的與下列各方共享閣下的個人資料：

- 渣打集團其他成員
- 獲授權第三方
  - 我們客戶的法定監護人、聯名帳戶持有人、實際或預期擔保人/保證人、受託人、受益人、遺囑執行人或獲授權人、與我們在任何銀行協議中的任何義務有關的任何實際或潛在參與者或次級參與者、受讓人、承繼人或承讓人（或前述任何一方的任何高級人員、僱員、代理人或顧問）
  - 閣下作出同意授權我們與之共享閣下個人資料的任何其他人士。
- 能夠驗證閣下資料的第三方
  - 征信機構或信貸資料服務機構（包括信貸資料服務機構使用的任何中央資料庫的營運商）、信用保護提供商、評級機構、追討欠款公司、防欺詐機構和組織
  - 進行金融犯罪預防資料庫核查以防止洗錢、恐怖主義、欺詐和其他金融犯罪的其他非政府第三方。
- 我們的服務合作夥伴
  - 專業顧問，如核數師、法律顧問、物業轉易律師和資產估值專家
  - 保險公司或保險經紀
  - 服務提供商，如營運、行政、數據處理和其他技術服務提供商，包括為分析和推動改進或提高渣打集團的營運或產品及服務的提供而聘用或合作的任何人士
  - 專業服務提供商，如市場研究人員、法証調查人員和管理顧問
  - 廣告公司和社交媒體平台提供商
  - 第三方產品提供商，包括證券和投資提供商、基金經理和保險公司等
  - 第三方服務提供商，如電話促銷、直銷代理和電話服務中心。
- 戰略轉介合作夥伴
  - 業務聯盟、聯合品牌合作夥伴或渣打集團根據合約安排或其他聯營安排與之合作以提供相關第三方產品及服務的其他公司或組織
  - 慈善和非牟利組織。
- 其他金融服務機構
  - 其他金融機構，如商業銀行、代理銀行或國家銀行
  - 市場基礎設施提供商和證券結算提供商
  - 支付服務提供商，包括流動錢包和數碼支付服務提供商、商戶、商業收單公司、信用卡公司、支付處理商和銀行卡協會成員、支付功能和銀行卡支付工具服務提供商，如VISA和Mastercard
  - 帳戶資料服務提供商
  - 閣下與之有或擬有交易往來的任何金融機構和商業收單公司。
- 政府機構、執法機關及其他
  - 法律規定的或任何機構（包括任何政府、半官方、監管機構、行政、管理或監督機構、法院、法庭、執法機關、交易所機構或國內外稅務機關）要求的，並對渣打集團任何成員擁有管轄權，無論該渣打集團成員是否位於閣下所在的司法管轄區，亦無論該渣打集團成員是否與閣下之間存在關係。渣打集團營運所在的任何相關司法管轄區內金融服務提供商的自律機構或行業機構或協會。



- 其他第三方

- 閣下所代表的或與閣下有關係的公司、企業或組織（如適用）
- 在我們轉讓（或計劃轉讓）或讓與我們任何部分業務或資產的合併、收購或資產剝離情況下的第三方。若交易順利進行，利益相關方可按照本私隱通告中規定的相同方式使用或披露閣下的個人資料，並隨後通知閣下他們在處理閣下的個人資料方面可能做出的任何更改。
- 對我們負有保密義務並承諾對此類資料保密的任何其他人，包括渣打集團的任何其他成員。

### 我們向何處傳輸個人資料？

我們可能為本私隱通告中所述之目的，在渣打集團內部或與其他第三方\*一同處理、保存、存儲、共享、轉移或披露閣下的個人資料。我們這樣做是為了有效、高效率、安全地運作以推動交易，為客戶提供產品及服務，改進和支持我們的流程和業務營運，並遵守我們的法定義務和監管義務。這可能涉及在境內或跨境至其他司法管轄區處理、保存、存儲、共享、轉移或披露閣下的個人資料，此等操作可能受限於相關的當地的做法及法律、規例和規則，包括外國政府機構可享有的查閱權。

\*請訪問我們的網站 ([www.sc.com/hk](http://www.sc.com/hk))，以了解該等第三方可能所處的國家列表。

若個人資料的接收人位於香港以外的司法管轄區，而當地法律可能沒有與香港類似的資料保障法例，我們會採取一切合理的必要措施，確保閣下的個人資料獲得適當的保護和保障，以符合適用法律的規定，例如使用個人資料私隱專員公署（「私隱公署」）發出的建議合約條文範本。

### 我們如何保護閣下的個人資料？

我們非常重視閣下個人資料的私隱及安全。為了保護閣下的資料，我們實施了一系列適當的技術、實體和組織措施來保護閣下的個人資料並使其保密，例如，在我們與第三方的安排中使用納入適當保密、資料保護和安全條文的合約。渣打集團已實施資料安全數據私隱政策，包括事件管理和報告程序、規則和技術措施，以保護個人資料並符合法律和監管要求。我們對有權查閱閣下個人資料的員工進行培訓並要求其遵守我們的數據私隱和安全標準。我們要求我們的服務提供商或我們與之有業務往來並向其披露閣下個人資料的其他第三方在處置、查閱或處理閣下的個人資料時實施類似的保密、數據私隱和安全標準及措施。

### 我們會將閣下的個人資料保存多長時間？

為本私隱通告中所述之目的，我們會在閣下與我們有業務往來期間，出於業務營運或法律原因保留閣下的個人資料，並可能根據我們的數據保留政策標準以及適用法律或法規的要求在之後的一段時間內保留閣下的個人資料，具體視個人資料的類別而定。當我們不再需要個人資料時，我們將採取措施予以刪除、匿名化處理、銷毀及/或停止使用。

### 閣下享有何等個人資料保護權利？

我們尊重閣下的個人資料，對於我們如何使用閣下的資料，閣下享有以下權利：

- **閣下有權查閱閣下的資料：**閣下有權檢查我們是否持有閣下的相關資料，並要求獲得資料副本
- **閣下有權改正閣下的資料：**閣下的個人資料如有變化，或者若閣下認為我們所持有的閣下的資料不正確或不是最新的，閣下可要求我們更新該等資料
- **閣下有權更改或撤回同意：**我們有時會要求閣下同意我們處理閣下的個人資料。若閣下改變主意，請告知我們。但是，若不提供某些個人資料，我們可能無法提供我們的產品及服務，或無法與閣下開展業務往來
- **閣下有權退出直接促銷：**閣下可隨時撤回閣下就接收調查邀請和促銷通訊所作的同意或表示反對。

我們將根據適用法律回應閣下行使個人資料權利的要求。在處理閣下的要求之前，我們可能會要求閣下核實身分。閣下對自身權利如有任何疑問，請按下文所載的詳細方式與我們聯絡。

### 如何聯絡我們

下列渣打集團公司作為資料使用者（在其他司法管轄區有時稱為控制者），負責在香港處理閣下的個人資料：

渣打銀行（香港）有限公司

如閣下需查閱或改正我們所持有的資料，或了解我們的資料政策和做法及我們所持有的資料類別，請將要求發送至以下人士：

資料保障主任渣打銀行（香港）有限公司

香港中央郵政信箱21號

根據條例規定，我們可就處理任何資料查閱要求收取合理費用。閣下對本私隱通告如有任何疑問，或希望行使閣下的任何個人資料保護權利，請隨時聯絡閣下的客戶經理或我們的指定熱線+852 2886 6023。

### 投訴

若閣下對我們如何使用閣下的個人資料有任何疑問或投訴，請與我們聯絡。閣下可聯絡分行或閣下的客戶經理，或聯絡我們的資料保障主任。閣下亦可在 <https://www.pcpd.org.hk> 上聯絡個人資料私隱專員公署（私隱公署）。

### Cookie

請參閱我們單獨的Cookie政策。

在本文件中，除非與文意不一致或另有訂明，否則下列詞匯的含義如下：

**帳戶**就我們可能不時向資料當事人提供的每項融通、服務或產品而言，指不時為此開立及/或維持的帳戶。

**帳戶持有人**指持有帳戶之人，若一個帳戶有多個持有人，則包括聯名帳戶持有人。

**資料當事人**具有條例所賦予的涵義，並包括融通、產品及服務的申請人或帳戶持有人、客戶、擔保提供者、保證人、推薦人、公司高級人員和經理（如獲授權簽署人、聯絡人、公司秘書、董事、股東、公司實益擁有人）、受益人、供應商、代理商、承包商、服務提供商及其他合約方，以及與我們或透過我們進行交易的任何第三方。

**披露**，就個人資料而言，包括披露從資料中推斷出的資訊。

**香港**指香港特別行政區。

**以任何身分**指不論作為借款人、按揭人或擔保人，以及不論以資料當事人的單一名義或與他人聯名。

**按揭宗數**指資料當事人（以任何身分）不時在香港的信貸提供者處持有的按揭貸款的宗數。

### 其他條款及條件

在我們的銀行業務和產品協議中可能有規管閣下個人資料之收集、使用和披露的具體條款及條件。該等其他條款及條件必須與本私隱通告一併閱讀。

本私隱通告的中英文文本如有不一致之處，應以英文文本為準。

本私隱通告於2023年11月26日更新。

### 附件1：《個人資料（私隱）條例》個人信貸資料實務守則

若閣下向我們申請貸款、現時或過去有我們提供的貸款（包括按揭貸款），我們可將閣下的個人資料提供予獲准參與「多家個人信貸資料服務機構營運模式」的信貸資料服務機構，或在閣下違約的情況下提供予追討欠款公司。信貸資料服務機構將使用該等資料對閣下在信貸提供者處持有的按揭進行統計，並將統計結果納入信貸提供者之間共享的個人信貸中央資料庫，以幫助信貸提供者評估是否向閣下提供信貸及是否追討欠款。

對於在2011年4月1日或之後資料當事人（以任何身分）申請的按揭貸款的相關資料，我們可代表我們自己及/或作為代理人，向信貸資料服務機構提供與資料當事人相關的以下資料（包括以下任何資料的任何經不時更新的資料）：

- 全名；
- 與每宗按揭貸款相關的身分（作為借款人、按揭人或擔保人，以及不論以資料當事人的單一名義或與他人聯名）；
- 香港身分證號碼或旅遊證件號碼；
- 出生日期；
- 通訊地址；
- 每宗按揭的按揭帳號號碼；
- 每宗按揭的貸款融通安排類別；
- 每宗按揭的按揭帳戶狀況（例如：生效、已結束、已撇帳（因破產令而撇帳除外）、因破產令而撇帳）；及
- 每宗按揭的按揭帳戶結束日期（如有）。

信貸資料服務機構將使用我們提供的上述資料，統計資料當事人不時分別以借款人、按揭人或擔保人的身分以及不論是以資料當事人的單一名義或與他人聯名在信貸提供者處不時持有的按揭貸款宗數，以供信貸提供者在信貸資料服務機構的個人信貸資料庫內共享（惟須符合根據條例核准及刊發的個人信貸資料實務守則的規定）。

我們在進行下列工作的過程中，可不時查閱信貸資料服務機構持有的按揭宗數：

- 考慮資料當事人（以任何身分）不時提出的按揭貸款申請；
- 檢視已批予或將批予資料當事人（以任何身分）的任何拖欠還款超過60日的信貸融通（包括按揭貸款），以便我們對該信貸融通制訂任何債務重組或重新安排或其他條款修訂；
- 當我們與資料當事人之間因拖欠償還信貸融通而對該信貸融通已制訂任何債務重組或重新安排或其他條款修訂時，檢視已批予或將批予資料當事人（以任何身分）的任何信貸融通（包括按揭貸款），以推行該等安排；
- 檢視已批予或將批予資料當事人（以任何身分）的任何信貸融通（包括按揭貸款），以便應資料當事人的要求對任何信貸融通制訂任何債務重組或重新安排或其他條款修訂；及/或
- 檢視、評估及修訂不時已批予或將批予資料當事人（以任何身分）的任何信貸融通（包括按揭貸款）的條款，並與資料當事人一起檢視該等條款。

（在2013年3月31日後）我們在進行下列工作的過程中，可不時查閱信貸資料服務機構持有的按揭宗數：

- 檢視及續批已批予或將批予資料當事人（以任何身分）的按揭貸款；及/或
- 考慮資料當事人（以按揭人以外的任何身份）的信貸融通（按揭貸款除外）申請及/或檢視或續批已批予或將批予資料當事人（以按揭人以外的任何身份）的任何融通（按揭貸款除外），在每種情況下，該等融通的金額不少於私隱公署不時訂明或核准的水平或私隱公署不時訂明或核准的機制所釐定的金額。

若帳戶出現任何拖欠還款的情況，除非拖欠還款在拖欠發生之日起60日期限屆滿前已全額償還或撇帳（因破產令導致的除外），否則信貸資料服務機構可保留帳戶還款資料（定義見上文），直至拖欠還款最終清償日期起計五年屆滿為止。

如帳戶中的任何款項因資料當事人被作出破產令而被撇帳，信貸資料服務機構可保留帳戶還款資料（定義見上文），而不論帳戶還款資料有否顯示拖欠還款超過60日，直至拖欠還款最終清償日期起計五年屆滿，或直至資料當事人向信貸資料服務機構提供證據通知破產已獲解除日期起計五年屆滿為止（以較早者為準）。

在不限制上述規定的一般性的原則下，我們可不時查閱信貸資料服務機構持有的資料當事人的個人及帳戶資料或記錄，以便就已批予資料當事人或已批予由資料當事人擔保其義務的第三方的現有信貸融通，檢視下列任何事項：

- 增加信用額；
- 縮減信貸（包括取消信貸或減低信用額）；及
- 與資料當事人或第三方制訂或推行債務安排計劃。

在考慮任何信貸申請或修訂信貸條款時，我們可從信貸資料服務機構獲取資料當事人的信貸報告。若資料當事人希望查閱信貸報告，我們會告知相關信貸資料服務機構的聯絡方式。

根據條例及個人信貸資料實務守則的條款，閣下享有以下額外權利：

- 向我們確定我們在個人資料方面的政策及程序，並獲告知我們持有的及/或閣下可查閱的個人資料的種類；
- 要求獲告知哪些資料通常會披露予信貸資料服務機構或追討欠款公司，並獲提供進一步資料，藉以向有關信貸資料服務機構或追討欠款公司提出查閱及改正資料要求；及
- 就我們向信貸資料服務機構提供的任何帳戶資料（為免生疑問，包括任何帳戶還款資料），指示我們在帳戶於全數清還欠款後結束時，向信貸資料服務機構提出自其資料庫刪除該等帳戶資料的要求，條件是該指示是在帳戶結束後五年內作出，且在緊接帳戶結束前五年內的任何時候，該帳戶並無拖欠還款超過60日。帳戶還款資料包括上次到期的還款額、上次報告期間所作還款額（即在緊接我們上次向信貸資料服務機構提供帳戶資料前不超過31日的期間）、剩餘可用信貸額或未償還數額及欠款資料（即過期欠款額及逾期還款日數、清還過期欠款的日期及全數清還拖欠超過60日欠帳的日期（如有））。

若閣下希望進一步詳細了解通常披露予信貸資料服務機構或追討欠款公司的資料，以及如何向該等機構提出查閱及改正資料要求，請與我們聯絡。

我們將根據適用法律回應閣下行使個人資料相關權利的要求。閣下如欲行使該等權利，請按本私隱通告「如何聯絡我們？」一節中所述的方式與我們聯絡。

## 附件2：使用應用編程接口 (API) 傳輸個人資料

我們可依照資料當事人向我們或資料當事人聘用的第三方服務提供商作出的指示，使用我們的API將資料當事人的資料傳輸至第三方服務提供商，以達致我們或第三方服務提供商告知資料當事人之目的及/或資料當事人根據條例所同意之目的。

## 附件3：中國《個人信息保護法》

在《中華人民共和國個人信息保護法》（「《個人信息保護法》」）適用於我們處理及/或使用閣下資料的情況下，本《個人信息保護法》附件是對香港私隱通告/個人資料收集聲明的補充。

### 敏感個人信息

敏感個人信息是指一旦泄露或者非法使用，容易導致任何自然人的的人格尊嚴受到侵害或者容易導致其人身、財產安全受到危害的個人信息，包括生物識別、宗教信仰、特定身分、醫療健康、金融帳戶、行蹤軌跡等信息，以及不滿十四周歲未成年人的個人信息。我們僅在有特定目的、確有必要並已採取嚴格保護措施的情況下處理閣下的敏感個人信息。若《個人信息保護法》適用於我們處理及/或使用閣下的資料，我們需另行徵得閣下的同意後方可處理此類敏感個人信息。

### 共享個人信息

在《個人信息保護法》要求的情況下，我們在與第三方共享閣下的個人信息之前，將通知閣下接收方的名稱和聯絡方式、處理及提供閣下個人資料的目的和方式，以及將提供和共享的個人信息的種類，並就共享閣下的個人信息單獨徵得閣下的同意。上述資料接收方將按照《個人信息保護法》的規定，為本私隱通告中規定的特定目的在必要的範圍內使用個人信息，並在達致該等目的所需的最短期限內或在《個人信息保護法》適用於我們處理及/或使用閣下資料的期間內存儲該等個人資料。

### 閣下根據《個人信息保護法》享有的額外權利

在《個人信息保護法》適用於我們處理及/或使用閣下資料的情況下，閣下享有以下額外權利：

- 要求我們刪除閣下的個人信息；
- 反對對閣下個人信息的某些使用；
- 要求對閣下個人資料的處理規則進行解釋說明；
- 在《個人信息保護法》規定的情況下，要求我們將閣下提供予我們的個人信息轉移至閣下選擇的第三方；
- 撤回對收集、處理或傳輸閣下的個人資料所作的任何同意（請閣下注意，撤回同意可能導致我們無法開立或維持帳戶，或設立或繼續提供銀行融通或提供銀行服務）；及
- 在某些服務中，我們可完全基於非人為的自動決策機制（包括信息系統、演算法等）做出決策。若此類決策對閣下的法律權利造成重大影響，閣下有權要求我們作出解釋，我們也將提供適當的補救措施。

渣打銀行(香港)有限公司

最近更新於2023年11月