

Personal Data Protection External Policy China Construction Bank Corporation (Singapore Branch)

The China Construction Bank Corporation, Singapore branch (“**the Bank**”) recognizes the importance of protecting individual rights in respect to privacy and personal data. Pursuant to this, the Bank strives to collect, store, use, process and disclose personal data in a manner consistent with the *Personal Data Protection Act 2012* (“**PDPA**”).

The PDPA framework operates alongside existing rules and regulations governing the protection of personal data by organisations. Under the PDPA, “personal data” is defined as “data, whether true or not, about an individual who can be identified either from that data, or from that data *and* other information to which the organisation has or is likely to have access”.

This Personal Data Protection External Policy (“**this Policy**”) outlines the Bank’s practices in relation to protecting personal data and is without prejudice to any other consent that the Bank has obtained or will obtain in relation to personal data. It also addresses how individuals may (a) withdraw their consent to the use or disclosure of their personal data; (b) request for access to their personal data which is in the Bank’s possession or control; and (c) request to correct any error or omission in their personal data which is in the Bank’s possession or control.

I. Purpose and Use

The Bank needs to collect, use, store, transfer, disclose and otherwise process certain personal data in order to run its business effectively, carry out day to day operations, meet corporate objectives and otherwise comply with relevant regulatory and legal obligations. Specific examples of how personal data is used in the Bank’s business include, but are not limited to:

- a. Providing banking (and other ancillary) services
- b. Managing internal business operations
- c. Performing accounting, administrative and other record keeping functions
- d. Complying with applicable reporting and regulatory requirements
- e. Budgeting, auditing and tracking organisational progress
- f. Providing customer support and responding to inquiries
- g. Undertaking marketing and public relations exercises

The Bank will handle personal data appropriately, in line with the circumstances at hand, and for lawful and targeted purposes. In the event that any intended use of personal data will go beyond the purposes envisioned during collection, the Bank will notify its customers of the new purpose(s) and seek consent to use their personal data for such purpose(s).

II. Collection

The Bank may collect personal data regarding its customers through several sources. The Bank will use its reasonable endeavours to ensure that any collection of personal data will be legitimate, adequate and relevant without being excessive to the envisioned purpose.

a. General

The general sources from which the Bank collects personal data from its customers are primarily (but not wholly) through account applications, forms, surveys, applications and other material obtained during the conduct of transactions. The Bank may also seek additional information from third parties such as credit bureaus or relevant authorities in order to comply with the law and/or process specific requests.

b. Website

When customers generally browse the Bank's website anonymously. However, the Bank may collect personal data where the customer provides information or login with account particulars.

A cookie is a small piece of information that is placed on a customer's computer when he or she accesses certain websites. Through the use of cookies, the Bank may collect information about a customer's computer (including IP address, operating system and browser type) and general internet usage for IT system administration purposes. This is statistical data which does not identify any individual.

III. Management

a. Accuracy

In order to assist the Bank in maintaining accurate, complete and up to date personal data, customers should advise the Bank's representatives of any relevant changes. The Bank will nevertheless use reasonable endeavours to ensure that personal data collected is accurate and kept up to date (especially where the Bank is likely to use the personal data to make a decision that affects the individual to whom the personal data relates or the Bank is likely to disclose such personal data to another organisation).

b. Security

Personal data within the Bank's possession or control will be subject to reasonable and appropriate physical, procedural and technological security arrangements in order to guard against risks such as unauthorized access, loss, destruction and falsification etc.

c. Withdrawal of Consent, Access and Correction of Personal Data

Individuals may withdraw their consent to any use of their personal data at any time. The Bank will also accommodate reasonable and rational requests by individuals to obtain access and make corrections to their personal data. All withdrawals of consent as well as requests for correction *must* be made in writing with sufficient details to the Data Protection Officer for the Bank to identify the applicant and the relevant personal data (together with such proof of identity as required). Requests for access and correction (especially those involving the Bank's Backup Server) will be subject to payment of a fee to cover for the difficulty and/or cost of accessing such data.

d. **Retention**

The Bank will retain personal data only for so long as necessary to fulfil the purpose(s) for which it was collected, unless a longer retention period is required or permitted by law. If for any reason the deletion of personal data is overly onerous and expensive (for example, a Backup Server may require a system reboot to reconfigure), the Bank will remove the means by which such personal data can be associated with particular individuals.

IV. Disclosure

In general, personal data will not be disclosed to third parties except in line with the following:

a. **Outsourcing and Transfer**

In line with its obligations under the PDPA, personal data required for the performance of services outsourced by the Bank shall only be communicated to external entities in accordance with the law and only to the necessary extent. The PDPA requires the Bank to take appropriate steps to ascertain whether, and to ensure that, the recipient of the personal data will be bound by legally enforceable obligations to provide the transferred personal data a standard of protection that is at least comparable to the protection under the PDPA. In this regard, the Bank will obtain contractual assurances from its agents (or third parties who receive such data, howsoever named) prior to transferring any personal data (whether within or outside Singapore) to the extent permitted by the PDPA in line with the above.

b. **China Construction Bank Affiliates**

The Bank may share personal data with its affiliates to the extent reasonably necessary for business purposes insofar as they do not contravene this Policy or the PDPA.

c. **Legal Purposes**

Do note that the Bank may be required to disclose personal data to authorities pursuant to investigations, audits or reporting obligations. In such circumstances, the Bank is exempted from obtaining consent.

V. CCTV Surveillance

The Bank's premises are under surveillance by closed circuit television cameras ("CCTV"). The purpose of such recordings is to enhance the security of the Branch's assets and premises and to monitor visitors' access to the Bank. The Bank will notify staff, customers and visitors that they will be monitored and images of them will be captured by the CCTV when they are on the Bank premises. Such notification may be verbal, written or in the form of signs and notices placed around the Bank's premises. All information recorded is the property of the Bank and is classified as confidential information. Only selected staff have access to this information.

Such recordings may be used to investigate security incidents or emergency situations. At the Bank's discretion, information that may reveal evidence of illegal activity, accidents or misconduct may be disclosed to the appropriate investigative or enforcement bodies.

Where practicable and reasonable, the Bank will aim to comply with Access or Correction requests as described above. However, please note that to the extent that such disclosure of CCTV recordings will fall within the exceptions under the PDPA and compromise the Bank's security arrangements and its safety or the safety of its staff or encroach into the privacy of or reveal the identity of other persons who may also feature on the recordings, such recordings will be excluded from Access or Correction rights described above.

VI Further Information

The Bank has a designated Data Protection Officer who assists in ensuring compliance with the Bank's Policy and miscellaneous data security issues. You may approach the Data Protection Officer via the following channels:

Email Address: dpo@ccb.com.sg

Mailing Address: 9 Raffles Place, #39-01, Republic Plaza, Singapore 048619

All enquiries, complaints and concerns in relation to this Policy or personal data protection should be directed to the Data Protection Officer. Customers who wish to withdraw their consent to the use of their personal data or to access or amend their personal data should do likewise. Do note that all enquiries must include the individual's name, address and other relevant contact information. The Bank will use reasonable efforts to address requests and enquiries without undue delay.

The Bank reserves the right to review and revise this Policy, and recommends that customers check it from time to time in order to keep apprised of all/any changes. Please be aware that this Policy is subject to the Laws of Singapore.