

Valid for:	Habib Bank Zurich (Hong Kong) Limited
Issuer:	COUNTRY DATA PROTECTION OFFICER
Entry into force:	1 January 2024

Privacy Policy Statement

Statement of Policy

Habib Bank Zurich (Hong Kong) Limited «HBZ» respects personal data privacy and is committed to implement and comply with the data protection principles and provisions under the Personal Data (Privacy) Ordinance (Cap. 486) (“PDPO”).

HBZ’s Privacy Principles / Statement of Practices

When applying for or use our accounts, services, products or activities, and during the continuation of the bank-customer relationship, we may collect your personal data and compile further personal data about you.

Such personal data usually includes your full name, identity card number, date of birth, address, contact details and information relating to your transactions.

When you browse or use our website or our mobile application (App) or enquire about our Bank and our accounts, services, products and activities, we may collect your email address, name or nickname, information of your mobile device, browser details, IP address, geolocation and other information.

The information collected by us may include your personal data and also other information which does not reveal your identity.

We may use your personal data and information for verifying your identity, providing accounts, services, products and activities, managing and enhancing our website and the App, and for related purposes.

Banking business has been built on trust between clients and HBZ. To preserve the confidentiality of all information of all information obtained from clients, HBZ maintain the following privacy principles:

- (i) HBZ only collects personal information that believe to be relevant and required to understand client’s financial needs and to conduct banking business.
- (ii) HBZ uses personal data to provide a better customer services and products.
- (iii) HBZ may pass personal data to the HBZ group or agents, as permitted by law.
- (iv) HBZ will not disclose personal data to any external organization unless HBZ obtains the consent from client or is required by law or has previously informed the client.
- (v) HBZ may be required from time to time to disclose personal data to governmental or judicial bodies or agencies or regulators, but HBZ will only do so under proper authority.
- (vi) HBZ aims to keep personal data on records accurate and up to date.
- (vii) HBZ maintain strict security systems designed to prevent unauthorized access to personal data by anyone, including bank staff.

- (viii) HBZ group, all staff and all third parties with permitted access to personal data are specifically required to observe HBZ confidentiality obligations.

By maintaining the above principals, HBZ will ensure that the bank respects the inherent trust that client places in HBZ.

Categories of Personal Data Held

HBZ holds the following categories of personal data:-

- I. Employment-related records which include data on job applications, personal particulars, education and qualifications, employment history, salary and allowances, participation in Mandatory Provident Fund, terms and conditions of service, housing and medical benefits, leave records, training and development, appraisal reports, conduct and discipline, etc.;
- II. General administrative records which include personal data collected in connection with the office administration functions, records containing information supplied by data subjects and collected in connection with the handling of enquiries and complaints made to HBZ, etc.;
- III. Customers records which include personal data collected in the course of handling customers' membership applications, transactions, complaints and enquiries, etc.; and
- IV. Other records which include administrative and programme records containing personal data.

Main Purposes of Keeping Personal Data

The main purposes of keeping the personal data are as follows:

- I. Employment-related records are kept for a range of appointments and human resource management purposes, including postings and transfers, training and career development, performance appraisal and promotion, discipline, offer of benefits, etc.;
- II. General administrative records are kept for the purposes of carrying out various office administration functions, responding to and taking follow-up actions on enquiries and complaints, etc.;
- III. Customer records are kept for the purposes of handling customers' membership applications, transactions, complaints and enquiries, etc.; and
- IV. Other records are kept for various purposes, which vary according to the nature of the records, such as procurement of stores and equipment, organization of activities, etc.

Practices of Personal Data Handling

The practices mentioned below are implemented to ensure that personal data held by HBZ is handled in accordance with the data protection principles enshrined in the PDPO.

Collection of personal data

When collecting personal data, HBZ will satisfy itself that:

- I. the purposes for which the data is collected are lawful and directly related to a function or activity of HBZ
- II. the manner of collection is lawful and fair in the circumstances of the case; and
- III. the personal data collected is necessary but not excessive for the purpose(s) for which it is collected.

When HBZ collects personal data from an individual, the individual will be provided with a Personal Data (Privacy) Ordinance Notification ("Notification") on or before the collection in an appropriate format and manner. Practicable steps will be taken to ensure that –

- I. the data subject is informed of whether it is obligatory or voluntary for him/her to supply the data and, if obligatory, the consequences for him/her if he/she fails to do so; and

- II. the data subject is explicitly informed of the purpose for which his/her personal data is to be used, the classes of persons to whom the data may be transferred or disclosed, the rights of the data subject to request access to and correction of the data, and the contact details of the individual to whom any such request may be made.

Accuracy and retention of personal data

- I. Personal data collected and maintained by HBZ shall be as accurate, complete, and up-to-date as is necessary for the purpose for which it is to be used.
- II. HBZ maintains a personal data inventory, which contains the kinds of personal data that HBZ holds; the purposes for which the personal data is collected, used and disclosed; and how the personal data is stored. The personal data inventory will be reviewed on an annual basis to ensure that it is accurate and up-to-date.
- III. Personal data will not be kept longer than necessary for the fulfilment of the purpose for which the data is collected or used. Personal data that is no longer required would be erased unless such erasure of personal data is prohibited under any law or it is in the public interest for the data not to be erased.
- IV. A destruction exercise on records containing personal data will be conducted as and when necessary and in accordance with HBZ records management directives and procedures.

Use of personal data

All personal data collected will be used only for purposes, which are directly related to the discharge of HBZ duties and responsibilities. Personal data collected may be transferred to third parties during the discharge of HBZ functions when necessary. Relevant personal data may also be disclosed to other entities which are authorized to receive information for the purposes of law enforcement, prosecution or review of decisions. Data subjects would be informed of the possible transferees of their personal data when their personal data is collected.

If personal data is to be used for a purpose other than the purposes for which the data is collected, express prior consent preferred in writing would be sought from the data subject concerned. In seeking the data subject's consent, all practicable steps would be taken to ensure that:-

- I. information provided to the data subject is clearly understandable and readable; and
- II. the data subject is informed that he/she is entitled to withhold his/her consent or withdraw his/her consent subsequently by giving notice in writing.

Use of personal data in direct marketing

HBZ will not use a personal data in direct marketing without client's consent. Please read Personal Information Collection Statement which is available on HBZ website (<https://hbzhongkong.com/home/Pics.pdf>) to see how we intend to use personal data in direct marketing and the scope of direct marketing.

Use of cookies

Cookies are simple text files which are stored on a device to keep track of visitor visiting to the website and preferences; as a user move between web pages, and sometimes to save settings between visits. Cookies help the builders of websites gather statistics about how often people visit certain areas of the website, and help in tailoring websites to be more useful and user-friendly. More details are available on our website <https://hbzhongkong.com/home/cookienotice.pdf>.

Security of personal data

HBZ observes strictly relevant security standards and regulations. Security arrangements will also be reviewed regularly to ensure that personal data is protected against loss and unauthorized or accidental access, use, disclosure, modification and erasure. The security arrangements adopted include but not limited to the following:

- I. restriction of access to personal data on a “need-to-know” basis;
- II. regular review and enhancement of security measures for protection of personal data in the servers, user computers, transmission of electronic messages, etc.;
- III. regular change of passwords for IT facilities, accounting and personnel systems, etc.;
- IV. limited staff access rights to office areas storing confidential information; and
- V. provision of clear guidelines to staff as to the types of data that may or may not be disclosed to a phone enquirer and implementation of appropriate identity verification procedures to confirm the enquirer’s identity.

Disclosure of personal data

HBZ will comply with the applicable requirements and restrictions under the Ordinance in disclosing personal data to any other person. Please read our Personal Information Collection Statement which is available on our website (<https://hbzhongkong.com/home/PICS.pdf>) for further information.

Outsourcing arrangement

HBZ may appoint service providers to process the information collected by HBZ. These service providers may include information technology contractors or consultants and software suppliers. All service providers are required by HBZ to comply with the applicable requirements and restrictions under the Ordinance and personal data access will be restricted to authorized personnel on a need-to-know basis.

Access to and correction of personal data

HBZ recognizes an individual’s rights of access to and correction of his/her own personal data in accordance with the PDPO. To make a data access request, an individual should complete the form specified by the office of the Privacy Commissioner for Personal Data, which is available at <http://www.pcpd.org.hk/english/publications/files/Dforme.pdf>, and submit the completed form to HBZ in any one of the following ways –

Habib Bank Zurich (Hong Kong) Limited

1701-05, Wing On
House, 71, Des Voeux
Road, Central, Hong
Kong.

Data Protection Officer can be reached at:

Phone: +852 29061139

Post: 1701-05, Wing On House, 17/F, Des Voeux Road, Central, Hong Kong.

When handling a data access or correction request, HBZ will check the identity of the requester to ensure that he/she is the person legally entitled to make the data access or correction request.

HBZ may impose a fee for the direct and necessary cost of complying with a data access request. HBZ will clearly inform the requestor the amount to be charged.

HBZ maintains a Register on Requests for Access to Personal Data recording the data access or correction requests received.

Incident Reporting and Breach Handling

A mechanism is set up for incident reporting and breach handling in case there is loss or leakage of personal data, or there is a reason to believe that the personal data held by HBZ has been compromised.

Ongoing Monitoring and Review

HBZ will keep the Privacy Policy and Practices under regular review. Officers responsible for handling personal data will attend relevant training courses to keep themselves updated of the latest personal data policies.