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# DATA PRIVACY POLICY

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## SECTION 1: HSBC DATA PRIVACY PRINCIPLES

- **Transparency:** We will be clear and transparent as to how we collect and use data, including providing data subjects with a statement of how we may use their data where required.
- **Fair and lawful usage:** We will only collect, process and store data lawfully and where we have a legitimate reason to do so.
- **Limited purposes:** We will collect and process data for specified and lawful purposes, and will not use it for further, incompatible purposes without first taking all steps necessary under applicable data privacy laws and regulations.
- **Data minimisation and adequacy:** We will ensure our collection, retention and processing of data is proportionate. We will strike an appropriate balance to ensure that we process sufficient data to carry on our business and achieve any specified lawful purpose, while making sure that we do not collect, retain or process excessive amounts of data.
- **Data quality and accuracy:** We will maintain appropriate standards of data quality and integrity, and we will implement policies in respect of data accuracy, including taking steps to avoid becoming out of date where appropriate.
- **Data security and retention:** We will retain data securely, implement appropriate data retention policies, and we will dispose of data securely once it is no longer required. We will ensure that appropriate processes are put in place so only HSBC colleagues with a business requirement to access such data are authorised and able to do so.
- **Training and awareness:** We will ensure that HSBC colleagues with access to data are trained appropriately on their obligations regarding those data.
- **Data subject rights:** We will ensure that data subjects' rights are observed in accordance with applicable data privacy laws and regulations, including any timeline established thereby.
- **Third parties:** Where we appoint a vendor or agent, we will require them to apply standards equivalent to the HSBC Data Privacy Principles. We will only disclose data to governmental or judicial bodies or law enforcement or agencies or our regulators where this is allowed by applicable data privacy laws and regulations, or otherwise required by applicable laws and regulations.
- **Data transfers:** Where we voluntarily transfer data to another HSBC entity, third party or to another jurisdiction, we will ensure that the data transfer is lawful and that the recipient is required to apply the same, or equivalent, standards as the HSBC Data Privacy Principles.

## SECTION 2: Data Privacy Notice

Your data (including personal data) is important to us. Read this notice to find out how we collect, store, use and share your data.

### 1 HOW WE COLLECT AND STORE YOUR DATA

#### We collect your data

- when you interact with us
- when you visit our websites or use our products, services and mobile apps
- from other people and companies
- from other HSBC group companies.

We store your data in physical or electronic form on our systems, our service providers' systems (including third party cloud providers) locally or overseas.

We comply with the laws of Singapore.

#### You can access your data or withdraw your consent

You can request access to the data we store about you. We may charge a fee for this.

You can also ask us to correct or update your data.

You can also withdraw your consent to any use of your data by contacting us.

### 2 WHAT WE USE YOUR DATA FOR

#### We use your data

- to provide products and services to you
- to market products or services to you if you've given us your consent to do so
- to comply with laws, regulations and requirements, including our internal policies
- to help us to prevent financial crimes
- to improve our products, services and marketing
- for the other purposes set out in sub-section A.

#### You can set your marketing preferences

You can contact us at any time if you don't want us to send direct marketing to you via certain channels, such as email, telephone calls, mobile messaging or post.

### 3 WHO WE SHARE YOUR DATA WITH

#### We may share your data

- with other companies and third parties who help us to provide services to you or who act for us
- with other HSBC group companies
- with third parties whom you consent to us sharing your data with
- with local or overseas law enforcement agencies, industry bodies, regulators or authorities
- with the other third parties set out in sub-section C.

We may share your data locally or overseas.

#### You can contact us

The Hongkong and Shanghai Banking Corporation Limited

sghdpo@hsbc.com.sg

Keep reading for more details ►►►

## More details

### A Data use

#### Your data may be used to

- assess you for products and services and enable us to provide and operate them
- conduct credit checks and reviews on you and obtain or provide credit references
- manage our business, including our credit and other risk management functions and to comply with our internal policies
- design and improve our products, services and marketing
- as described in sub-section D, provide you with marketing information
- exercise our rights under contracts with you, including collecting any amounts due from you
- comply with compulsory or voluntary requirements that we or the HSBC group has such as legal, tax, regulatory, sanctions or market requirements in Singapore and overseas
- comply with requests made by different bodies or authorities such as legal, regulatory, law enforcement, government and tax authorities in Singapore and overseas. Sometimes we may have to comply with such requests and other times we may choose to voluntarily comply
- comply with our or any HSBC group company's policies, procedures and other commitments in the detection, investigation and prevention of financial and other crimes. This may involve sharing your data in Singapore and overseas. This is important in our wider fight against these crimes
- allow any company that we transfer our business or assets to, to evaluate our business and use your data after any transfer
- any other uses for which you have given consent
- any purpose relating to any of the purposes above.

#### Your rights

You can request access to your data, correct data that we hold about you, withdraw consent to use of your data and give feedback. We may be unable to provide you with access to some data — if so, we'll explain why not unless it's not lawful to tell you. If you withdraw consent, we may be unable to continue providing products or services to you. This may result in the end of some or all of our contractual relationships with you. You can also ask us to explain our data policies and practices.

### B Data collection and storage

#### We may collect

- data that you give to us such as your contact and identification details
- biometric data such as your voice ID and facial recognition data
- your geographic data and location data based on your mobile or other electronic device.

If you don't give us data or if you withdraw your consent to any use of your data then we may be unable to provide products or services. We may also collect data about you from third parties such as

- people who act for you or whom you give consent to transfer data to us
- publicly available sources and agencies that collect data which they summarise and use to create statistics
- credit reference, debt collection and fraud prevention agencies
- people who you deal with through our services.

We may also generate information about you

- by combining information that we and other HSBC group companies have collected about you
- based on the analysis of your interactions with us
- through the use of cookies and similar technology when you access our website or apps. See our cookies policy below.

#### Storing your data overseas

We may transfer and store your data overseas, including places that don't have the same level of protection for personal data.

#### Protecting your stored data

While we store it, your data is protected by physical, electronic and procedural safeguards and governed by the laws of Singapore (including the Personal Data Protection Act).

Our third party service providers that receive your data are required to comply with strict measures to protect your data.

**If you provide data about others** If you provide data to us about another person (such as a joint account holder, trustee, beneficiary or guarantor) you must make sure that you have obtained written consent from such person and that you have retained proof of these consents. You must provide us with such proof if we request for it.

### C Data sharing

#### We share your data with

- HSBC group companies or business divisions
- third parties who provide services to us and other third parties we work with
- credit reference, debt collection and fraud prevention agencies
- any bodies or partnerships between law enforcement and the financial sector or authorities, such as legal, regulatory, law enforcement, government and tax authorities in Singapore or overseas or anyone acting for them
- any person whom you hold a joint account with, people who can give instructions for you and anyone who is giving (or may give) security for your loans
- any third party whom we may transfer our business or assets to
- partners and providers of reward, co-branding or loyalty programs, charities or non-profit organisations
- social media advertising partners (who can check if you hold an account with them for marketing purposes and the partner may then use your data to send our adverts to you and advertise to people who have a similar profile to you)
- any other third parties whom you have consented to us sharing your data with. We may share your anonymised data with other parties not listed above. If we do this you won't be identifiable from this data.

### D Direct Marketing

This is when we use your personal data to send you details about products, services and offers such as financial, insurance or related products and services provided by us or our co-branding partners, rewards, loyalty privileges or charities. This includes providing you with personalized marketing (including by aggregating your data with data of others or through social media advertising partners). We'll only do this where you've consented (including by you giving us an indication of no objection where this is permitted by law).

We may use your contact details and data such as your demographic information, the products and services that you're interested in, transaction behaviour, portfolio information, location data, social media data, analytics and information from third parties when we market to you.

You can tell us any time if don't want to receive marketing from us by updating your marketing preferences on our web-site, clicking our "unsubscribe" links in our emails or by contacting us (it may take a short time to update our records to reflect any change).

We'll need to get your separate consent to share your data with other HSBC companies and business divisions, or third parties for them to market their products and services to you.

## SECTION 3: Website Policy

- **COOKIES:** We will assess your usage and activities on our website to improve your experience when visiting the site. We will also work with third parties including Doubleclick, Yahoo!, Facebook, Nielsen//NetRatings, WebTrends and Adobe, who use technologies such as cookies, spotlight monitoring and web beacons to collect and use information (i) to find out more about users of our website, including user demographics and behaviour and usage patterns, (ii) for more accurate reporting, and (iii) to provide you with personalized marketing based on your individual interests, if you've given us your consent to do so.
- **THIRD PARTY SITES:** Our website may contain links to other websites operated by third parties. Your use and access of such links is governed by the Hyperlink Policy <https://www.hsbc.com.sg/hyperlink-policy/> and we are not responsible for the privacy practices of such websites.

This Policy will apply for as long as we store your data. We'll review this Policy from time to time and may make changes. We'll notify you if any changes are made.