



BNP PARIBAS HONG KONG BRANCH Personal Data Privacy Policy Statement

1. Introduction

- 1.1 This Policy Statement is adopted as the Personal Data Privacy Policy Statement (“**Policy Statement**”) of BNP Paribas Hong Kong Branch and its affiliates and subsidiaries (collectively, “**BNPP**”). The purpose of this Policy Statement is to set out the policies and practices of BNPP’s commitments to protect the privacy of personal data and to comply with the requirements of the Personal Data (Privacy) Ordinance in Hong Kong (the “**Ordinance**”).
- 1.2 From time to time, it is necessary for customers and various other individuals to supply BNPP with personal data in connection with the opening or continuation of accounts and the establishment or continuation of banking facilities or provision of banking, financial and/or brokerage services. Failure to supply such data may result in BNPP being unable to open or continue accounts or establish or continue banking facilities or provide banking, financial and/or brokerage services.

2. Kinds of Personal Data held by BNPP – Customers and Employees

- 2.1 Personal Data held by BNPP regarding customers may include the following:-
- (a) name, address, contact details, date of birth and nationality of customers and directors and shareholders of corporate customers and their identity card and/or passport numbers and place and date of issue thereof;
 - (b) details of investments, properties or assets held by customers;
 - (c) details of all liabilities, actual or contingent of the customers;
 - (d) information obtained by BNPP in the ordinary course of business, e.g. when customers write cheques or deposit money or generally communicate with bank orally (by means of telephone recording system) or by means of documentation;
 - (e) credit standing information provided by a referee, credit reference agency or debt collection agency; and
 - (f) information which is in the public domain.
- 2.2 For Personal Data held by BNPP relating to employment, please refer to the Instruction Note No. 2492 for details.
- 2.3 BNPP may hold other kinds of personal information which it needs in light of the circumstances or in relation to any particular kind of services or products.



3. Purposes for which Personal Data may be used

3.1 The purposes for which the personal data of customers may be used are as follows: -

- (a) the daily operation of the services and credit facilities provided to the customers;
- (b) conducting credit checks at the time of application for credit and at the time of regular or special reviews which normally will take place one or more times each year;
- (c) creating and maintaining the credit scoring models of BNPP;
- (d) assisting other financial institutions to conduct credit checks and collect debts;
- (e) ensuring ongoing credit worthiness of the customers;
- (f) designing financial services or related products for the customers' use;
- (g) marketing the following services and products (in respect of which BNPP may or may not be remunerated):
 - (1) financial, insurance, credit card, banking and related services and products;
 - (2) reward, loyalty or privileges programmes and related services and products; and
 - (3) services and products offered by BNPP's co-branding partners (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

these services or products may be provided and/or marketed by:

- (1) BNPP, its branches and any member of the BNP Paribas Group;
 - (2) third party financial institutions, insurers, credit card companies, securities and investment services providers;
 - (3) third party reward, loyalty or privileges programme providers; and
 - (4) co-branding partners of BNPP, any branches and any member of the BNP Paribas Group;
- (h) verifying the data/information provided by any customer or third party
 - (i) determining amounts owed to or by the customers;



- (j) collection of amounts outstanding from the customers and those providing security or guarantee for customers' obligations;
- (k) meeting the requirements to make disclosure under the requirements of any law binding on BNPP or any of its branches or under and for the purposes of any guidelines or requirements issued by regulatory or other authorities with which BNPP or any of its branches are expected to comply;
- (l) enabling an actual or proposed assignee of BNPP, or participant or sub-participant of BNPP's rights in respect of the customers to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation; and
- (m) purposes relating thereto.

4. Security of Personal Data

- 4.1 It is BNPP's policy that all personal data held relating to customers and employees will be kept strictly confidential and it is also BNPP's policy to meet international standards of personal data privacy protection and to comply with the requirements of all applicable data protection and privacy laws.
- 4.2 Notwithstanding Clause 4.1 above, BNPP may provide such information to the following parties for the purposes set out in Clause 3 above:
 - (a) any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to BNPP;
 - (b) any other person under a duty of confidentiality to BNPP, including its branches and any other member of the BNP Paribas Group;
 - (c) the drawee bank providing a copy of a paid cheque (which may contain information about the payee) to the drawer;
 - (d) credit reference agencies and debt collection agencies;
 - (e) any person to whom BNPP is under an obligation to make disclosure under the requirements of any law binding on BNPP or any of its branches or under and for the purposes of any guidelines or requirements issued by regulatory or



other authorities with which BNPP or any of its branches are expected to comply;

- (f) any actual or proposed assignee of BNPP or participant or sub-participant or transferee of BNPP's rights in respect of data subjects;
- (g)
 - (1) other branches of BNPP and any member of the BNP Paribas Group;
 - (2) third party financial institutions, insurers, credit card companies, securities and investment services providers;
 - (3) third party reward, loyalty and privileges programme providers;
 - (4) co-branding partners of BNPP, its branches and any member of the BNP Paribas 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);
 - (5) external service providers (including but not limited to mailing houses, telecommunication companies, telemarketing and direct sales agents, call centres, data processing companies and information technology companies) that BNPP engages for the purposes set out in Clause 3 above.

Such information may be transferred to a place outside Hong Kong.

5. Accuracy of Personal Data

It is the policy of BNPP to ensure accuracy of all personal data collected and processed by BNPP. BNPP has taken and will take appropriate measures and procedures to regularly check and update all personal data held by it to ensure their accuracy.

6. Data Access Requests and Data Correction Requests

It is the policy of BNPP to comply with any data access requests and data collection requests in accordance with the Ordinance. BNPP may impose a reasonable fee for complying with such requests in accordance with the Ordinance. Any data access requests and data correction request may be addressed to the Data Protection Officer set out below.

7. Internet Banking

- 7.1 It is also the policy of BNPP to follow strict security and confidentiality standard to protect information transferred online to BNPP, including using encryption technology in data transmission so as to protect the data privacy and confidentiality.



- 7.2 For the purpose of internet banking, cookies are occasionally used. Cookies are small data files that the web server of BNPP sends to the users' web browser when users visit certain parts of the website of the internet banking. These cookies do not collect or store data or personal information. Most web browsers are initially set up to accept cookies and users may disable the cookies by changing the setting on the users' web browser. However, please note that the users may not be able to use certain functions of the internet banking by disabling the cookies.

8. Retention of Personal Data

BNPP shall hold personal data for a period of 7 years or such other period as prescribed by applicable laws and regulation after closure of account or termination of services.

9. Data Protection Officer

In accordance with the Ordinance, BNPP has appointed the Data Protection Office to handle all matters relating to personal data protection. In relation to requests for access to data or correction of data or for information regarding personal data policies and practices, please address the request / query to: -

The Data Protection Officer
BNP Paribas
63/F Two International Finance Centre,
8 Finance Street, Hong Kong
Telephone: 2909 8888
Fax: 2970 1041

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