

Personal Information Collection Statement

Notice to Customers and Other Individuals relating to the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) (the “PDPO”) and the Code of Practice on Consumer Credit Data

Collection of personal data

1. From time to time, it is necessary for data subjects to supply PAO Bank Limited (the “Bank”) with data in connection with, or for the purpose of, the provision, maintenance and administration of accounts, banking or other financial services by the Bank or compliance with any laws, guidelines or request given or issued by regulatory or other authorities. Failure to supply such data promptly may result in the Bank being unable to provide or continue to provide such accounts or other banking or financial services.
2. The Bank may also collect and compile further personal data from data subjects during the continuation of the banking relationship or during the Bank's provision of other financial services, for example, when data subjects deposit money or otherwise carry out transactions as part of the Bank's services. The Bank will also collect data relating to a data subject from third parties, including third-party service providers with whom the data subject interacts in connection with the marketing of the Bank's products and services and in connection with the data subject's application for the Bank's products and services (including receiving personal data from credit reference agencies approved for participation in the Multiple Credit Reference Agencies Model (the “Credit Reference Agencies” and each a “Credit Reference Agency”).

Types of personal data

3. The personal data collected and compiled by the Bank usually includes the full name, identity card number, date of birth, biometric data, address, contact details, geographic data and location data collected from a data subject's electronic device or otherwise and other information relating to the relevant accounts and transactions.

Use of personal data

4. The Bank may use the personal data relating to a data subject for one or more of the following purposes from time to time:
 - (a) considering, assessing and processing the data subject's applications or requests for accounts, services, products or activities;
 - (b) providing, maintaining and managing the accounts, services, products and activities provided by the Bank, and enabling the data subject to use and operate them;
 - (c) establishing and verifying identity as required or appropriate from time to time;
 - (d) conducting ongoing assessments on whether it is appropriate for the Bank to provide or continue to provide accounts, services, products and activities to the data subject;
 - (e) conducting credit checks at the time of application for credit and at the time of regular or special reviews which normally takes place one or more times each year;
 - (f) creating and maintaining the Bank's credit scoring and risk management models;
 - (g) creating and maintaining credit history and records about the data subject;
 - (h) assisting other credit providers approved for participation in the Multiple Credit Reference Agencies Model to conduct credit checks and collect debts;
 - (i) assessing and ensuring the data subject's ongoing credit worthiness;
 - (j) designing financial services or related products for the data subject or for the Bank's customers generally;

- (k) marketing services, products and other subjects (please see further details in paragraph 7 below);
- (l) determining amounts owed to or by the data subject, and enforcing the Bank's rights and powers in connection with the accounts, services, products or activities provided by the Bank to the data subject, including recovering any amount payable to the Bank;
- (m) collection of amounts outstanding from the data subject and those providing security for the data subject's obligations;
- (n) complying with the obligations, requirements or arrangements for disclosing and using personal data that apply to the Bank or that the Bank is expected to comply according to:
 - (1) any law in or outside Hong Kong, whether existing currently or in the future, including but not limited to the laws relating to the detection, investigation and prevention of money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions or other unlawful activities, and/or acts or attempts to circumvent or violate these laws (collectively, the "Crime-countering Matters") (e.g. the Hong Kong Inland Revenue Ordinance requiring automatic exchange of financial account information amongst tax authorities in Hong Kong and overseas);
 - (2) any guideline, direction, demand or request given or issued by any local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, self-regulatory or industry bodies of financial institutions, or stock exchanges (collectively, the "Authorities and Organisations"), whether existing currently or in the future, including those relating to any law or the Crime-countering Matters (e.g. guideline issued by the Hong Kong Inland Revenue Department on automatic exchange of financial account information);
 - (3) any present or future contractual or other commitment with any of the Authorities and Organisations that is assumed by or imposed on the Bank by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant Authority or Organisation;
- (o) complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing personal data and information within the group of the Bank and/or any other use of personal data and information in accordance with any group-wide programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
- (p) enabling an actual or proposed assignee of the Bank, or participant or sub-participant of the Bank's rights in respect of the data subject to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation;
- (q) comparing or matching personal data in which:
 - (1) comparing personal data for credit checking, data verification or otherwise producing or verifying data; or
 - (2) matching personal data (as defined in the PDPO), but broadly includes comparison of two or more sets of the data subject's data
 - (3) for purposes of taking adverse action against the data subject such as declining an application or purposes specifically provided for in any particular service or facility offered by the Bank; and
- (r) purposes relating thereto.

Disclosure of personal data

5. Personal data relating to a data subject held by the Bank will be kept confidential but the Bank may provide the personal data to the following persons from time to time for the purposes set out in paragraph 4 above:

- (a) any agent, contractor or third party service provider who provides services or technology to the Bank in connection with the Bank's business and operation, including administrative, telecommunications, data processing, information technology security, computer, electronic, digital or mobile services or technology, payment services or technology, handling and processing disputes and investigation relating to transactions or card schemes, telemarketing or direct sales, customer service centre, or other services or technology to the Bank in connection with the operation of its business;
 - (b) any other person under a duty of confidentiality to the Bank including a group company of the Bank which has undertaken to keep the personal data confidential;
 - (c) any other financial institution or any other person who needs to be provided with the personal data in order for the Bank to provide or for the data subject to use the accounts, services, products and activities;
 - (d) the Credit Reference Agencies (including the operator of any centralised database used by the Credit Reference Agencies), and in the event of default, to debt collection agencies;
 - (e) any person to whom the Bank is under an obligation or otherwise required to make disclosure under the requirements of any law binding on or applying to the Bank, or any disclosure under and for the purposes of any guidelines or guidance given or issued by any Authorities and Organisations with which the Bank are expected to comply, or any disclosure pursuant to any contractual or other commitment of the Bank with any Authorities and Organisations, all of which may be within or outside Hong Kong and may be existing currently and in the future;
 - (f) any actual or proposed assignee of the Bank or participant or sub-participant or transferee of the Bank's rights in respect of the data subject; and
 - (1) the Bank's group companies;
 - (2) third party financial institutions, insurers, credit card companies, securities and investment services providers and providers or operators of card schemes, payment systems or payment network;
 - (3) third party reward, loyalty, co-branding and privileges programme providers;
 - (4) third party service providers with whom the data subject has chosen to interact with in connection with the data subject's application for the Bank's products and services or such providers' products and services;
 - (5) co-branding partners of the Bank and the Bank's group companies (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);
 - (6) charitable or non-profit making organisations; and
 - (7) 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 the Bank engages for the purposes set out in paragraph (4)(k) above.
6. Personal data relating to a data subject may be transferred to a place outside Hong Kong, including to the People's Republic of China (the "PRC", which for the purpose of this Personal Information Collection Statement, excludes Hong Kong, Macao and Taiwan). A PRC data subject (as defined in Schedule 1 hereto) will be additionally subject to Schedule 1 (People's Republic of China Addendum) hereto. In the event of any inconsistency between this Personal Information Collection Statement (excluding Schedule 1) and Schedule 1 hereto in respect of the personal data of a PRC data subject, Schedule 1 shall prevail.

Use of personal data in direct marketing

7. The Bank intends to use a data subject's personal data in direct marketing and the Bank requires the data subject's consent (which includes an indication of no objection) for that purpose. In this connection, please note that:
- (a) the name, contact details, products and services portfolio information, transaction pattern and behaviour, geographic data and location data collected from a data subject's electronic device or otherwise, financial background and demographic data of a data subject held by the Bank from time to time may be used by the Bank in direct marketing;
 - (b) the following classes of services, products and subjects may be marketed:
 - (1) financial, insurance, cards (including credit card, debit card, payment card and stored value card), banking and related services and products;
 - (2) reward, loyalty or privileges programmes and related services and products;
 - (3) services and products offered by the Bank'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
 - (4) donations and contributions for charitable and/or non-profit making purposes;
 - (c) the above services, products and subjects may be provided or (in the case of donations and contributions) solicited by the Bank and/or:
 - (1) the Bank's group companies;
 - (2) third party financial institutions, insurers, card companies, securities and investment services providers;
 - (3) third party reward, loyalty, co-branding or privileges programme providers;
 - (4) co-branding partners of the Bank and the Bank's group companies (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
 - (5) charitable or non-profit making organisations;
 - (d) in addition to marketing the above services, products and subjects itself, the Bank also intends to provide the personal data described in paragraph 7(a) above to all or any of the persons described in paragraph 7(c) above for use by them in marketing those services, products and subjects, and the Bank requires the data subject's written consent for that purpose; and
 - (e) the Bank may receive money or other property in return for providing the personal data to the other persons in paragraph 7(d) above and, when requesting the data subject's consent as described in paragraph 7(d) above, the Bank will inform the data subject if it will receive any money or other property in return for providing the personal data to the other persons.

If a data subject does not wish the Bank to use or provide to other persons his/her personal data for use in direct marketing as described above, he/she may exercise his/her opt-out right by notifying the Bank.

Code of Practice on Consumer Credit Data

8. Transfer of personal data to third-party service providers using bank application programming interfaces ("API")

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

9. Under and in accordance with the terms of the PDPO and the Code of Practice on Consumer Credit Data, a data subject has the right:
 - (a) to be informed on request which items of data are routinely disclosed to the Credit Reference Agencies or debt collection agencies, and be provided with further information to enable the making of an access and correction requests to the relevant Credit Reference Agency(ies) or debt collection agency(ies); and
 - (b) in relation to any account data (including, for the avoidance of doubt, any account repayment data) which has been provided by the Bank to a Credit Reference Agency, to instruct the Bank, 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 the 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 the Bank 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)).
10. 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 in paragraph 9(b) above) may be retained by the Credit Reference Agencies until the expiry of five years from the date of final settlement of the amount in default.
11. 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 in paragraph 9(b) above) may be retained by the Credit Reference Agency(ies), 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.
12. The Bank may make certain inquiries into a data subject's credit history and repayment habits by accessing the data subject's credit report(s) held by one or more Credit Reference Agencies in Hong Kong (as the case may be) for the Bank to determine the data subject's financial creditworthiness. Please note that the data subject is entitled to request for his/her respective credit report from the Credit Reference Agencies or similar service provider(s) without charge in any 12-month period. Please refer to the details of the Credit Reference Agencies currently engaged by the Bank below:

TransUnion

Address: Suite 811, 8th Floor, Tower 5, The Gateway, 15 Canton Road, Tsim Sha Tsui, Kowloon, Hong Kong
 Telephone No.: +852 2577 1816 Email: contact@transunion.hk

Ping An OneConnect Credit Reference Services Agency (Hong Kong) Limited

Address: Room 2701, 27th Floor, Central Plaza, 18 Harbour Road, Wanchai, Hong Kong Telephone No.: +852 2271 6268
 Email: cra_contact@paoc.com.hk

Right of access and correction of personal data

13. A data subject has the right:
 - (a) to check whether the Bank holds the data subject's personal data and to access the data subject's personal data held by the Bank;
 - (b) to require the Bank to correct any of the data subject's personal data which is inaccurate; and

- (c) to ascertain the Bank's policies and practices in relation to personal data and to be informed of the kind of personal data held by the Bank.
- 14. In order to enable the Bank to process any data access or data correction request, the person making such request will have to provide information to verify his/her identity and his/her right to access or correct the personal data. The Bank may charge a fee for processing a data access or data correction request which must not be excessive.
- 15. Requests for access to or correction of personal data or enquiries about the Bank's personal data policies and practices should be addressed to:

The Data Protection Officer
 PAO Bank Limited
 Room 1903-1904, NEO
 123 Hoi Bun Road
 Kwun Tong, Kowloon
 Hong Kong

The Bank's privacy policy

- 16. The Bank's privacy policy sets out its security policy and practices in handling personal data, including the Bank's policy in using "cookies". Data subjects may read the privacy policy which is available below.
- 17. Nothing in this Statement shall limit a data subject's rights under the PDPO.

In this Statement, unless inconsistent with the context or otherwise specified, "data subject(s)" has the meaning given to it in the PDPO and includes applicants or accountholders for the Bank's products and services, customers, security providers, guarantors, referees, corporate officers and managers, (e.g. authorised 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 the Bank.

Please circulate this Statement to any and all data subject(s) relating to your account(s) at the Bank. If there is any inconsistency between the English and Chinese versions of this Statement, the English version shall prevail.

Schedule 1 People's Republic of China Addendum

Introduction

1. This People's Republic of China Addendum ("PRC Addendum") supplements the Personal Information Collection Statement of the Bank (the "PICS") and applies to the personal data of data subjects who are residents of the PRC (each a "PRC data subject") that are subject to the Personal Information Protection Law of the People's Republic of China and its subordinate laws and regulations (the "PIPL"). This PRC Addendum forms a part of the PICS and the Privacy Policy of the Bank (the "Privacy Policy"), and in the case of any inconsistencies between this PRC Addendum and the rest of the PICS and the Privacy Policy, this PRC Addendum prevails insofar as the personal data of a PRC data subject is concerned. Unless context requires otherwise, capitalised terms used herein shall have the same meanings as those defined in the PICS and the Privacy Policy.
2. Unless the Bank is specifically required by the PIPL to obtain any additional consent, by providing any data to the Bank, a PRC data subject is deemed as having provided explicit consent to the Bank to process, use and/or handle his/her personal data in accordance with the PICS, the Privacy Policy and this PRC Addendum. If any PRC data subject refuses to give or wishes to revoke any such explicit consent (whether by way of exercising his/her rights under paragraph 6 below), the Bank's services to the PRC data subject may be affected.

Legal basis for data processing

3. In addition to the purposes set out in the PICS, the Bank may also use, process and/or handle the personal data of a PRC data subject for the following purposes from time to time:
 - (a) to respond to sudden public health incidents or to protect individual's lives, health or properties under emergency conditions; or
 - (b) to implement news reporting, public opinion supervision and other such activities for the public interest, provided that such processing is carried out within a reasonable scope and to the extent permitted by the PDPO and the PIPL.
4. To the extent permitted by law, in respect of any personal data of a PRC data subject, the Bank may also:
 - (a) publicly disclose such personal data;
 - (b) collect such personal data from public places and use the same for any purpose;
 - (c) export such personal data from the PRC to any data processor outside of the PRC; or
 - (d) use, process and/or handle such personal data through any computer and/or technological systems.

Sensitive personal data

5. **Some personal data that the Bank collects from a PRC data subject may constitute "sensitive personal data" as defined in the PIPL.** This refers to personal data that is likely to result in damage to the personal dignity of any natural person or damage to the data subject's personal or property safety once disclosed or illegally used, including information such as biometric identification, religious belief, specific identity, medical health, financial account and whereabouts and tracks, as well as the personal data of minors under the age of 14. The Bank will process such sensitive personal data and implement necessary security measures, policies and procedures in line with applicable laws and regulations.

Rights under the PIPL

6. In addition to the relevant rights stated in the main body of the PICS, a PRC data subject would also have the rights:
- (a) to restrict or object to the Bank's processing of his/her personal data;
 - (b) to request the Bank to provide the portal for transferring his/her personal data to other controllers, but the Bank may grant such request only if the conditions set by the PRC data protection regulator, Cyberspace Administration of China (CAC), have been met;
 - (c) to withdraw consent to use his/her personal data; and
 - (d) to request the Bank to delete his/her personal data held by the Bank, but only if:
 - (1) the Bank has violated any applicable laws and regulations or breached any contracts with him/her when collecting or using his/her personal data;
 - (2) the Bank has no lawful basis to collect his/her personal data;
 - (3) he/she has withdrawn his/her consent; or
 - (4) the Bank no longer provides any services to him/her.

Notwithstanding any rights that a PRC data subject may exercise, the validity of any processing of his/her personal data which the Bank has already carried out prior to his/her withdrawal of consent shall not be affected.

Miscellaneous

7. If there is any inconsistency between the English and Chinese versions of this PRC Addendum, the English version shall prevail.

PAO Bank Limited
Privacy Policy

1. Introduction

PAO Bank Limited, together with its affiliates (collectively, “we”, the “Bank” or “PAObank”) are committed to protecting personal data in accordance with the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) (the “PDPO”).

We will only collect, use, transfer or disclose personal data in accordance with the PDPO, our Personal Information Collection Statement (“PICS”) and this Privacy Policy (“Privacy Policy”).

We may amend this Privacy Policy at any time and for any reason. The updated version will be available on our website at www.paob.com.hk. You should check the Privacy Policy regularly for changes.

In this Privacy Policy, unless inconsistent with the context or otherwise specified,

“data subject(s)” has the meaning given to it in the PDPO and includes applicants or accountholders for the Bank’s products and services, customers, security providers, guarantors, referees, corporate officers and managers, (e.g. authorised 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 the Bank; and

“personal data” means any data:

- (a) relating directly or indirectly to a living individual;
- (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and
- (c) in a form in which access to or processing of the data is practicable.

2. When and what personal data do we collect?

The types of personal data we collect from a data subject will depend on the circumstances in which that information is collected. If the personal data that we request from a data subject is not provided, we may be unable to provide or continue to provide products and services to the data subject.

The personal data collected and compiled by PAObank usually includes the full name, identity card number, date of birth, address, contact details, information relating to bank accounts and transactions, geographic data and location data collected from a data subject’s electronic device or otherwise and biometric data of a data subject.

We may collect personal data about a data subject when the data subject:

- use our online platform and request for services, product or activities – including the data subject’s identity and contact details, geographic data and location data, the data subject’s biometric data, financial information about the data subject, information about the data subject’s income and existing investments;
- apply to open an account with us and use this account, and during the continuation of the bank-customer relationship – including financial information about the data subject, information about the data subject’s income and existing investments;
- are a signatory, shareholder or director or officer or guarantor of a corporation opening an account with us – including the data subject’s identity and contact details;

- apply for employment with us – including the data subject's identity and contact details, information about the data subject's skills and abilities, bank account information for payroll purposes, details regarding family members for medical insurance purposes, information about criminal record and other information relevant to our compliance obligations; or
- send us correspondence – including the data subject's contact details in order to respond to the data subject.

3. What do we use personal data for?

The purposes for which a data subject's personal data may be used will depend on the circumstances in which that personal data is collected.

We will inform the data subject of the purposes for which we intend to use the data subject's personal data and the classes of persons to whom his/her data may be transferred (among other things) in the PICS at or before the time we collect the data subject's personal data.

Generally, we may use a data subject's personal data for:

- the purpose for which the data subject provided it to us;
- purposes which are directly related to the purpose for which the data subject provided it to us;
- any other purposes to which the data subject has consented;
- complying with any law and regulation binding on us, and any guideline or notice given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations in connection with us and our products and services;
- complying with the obligations, requirements or arrangements for disclosing and using personal data that apply to the Bank or that the Bank is expected to comply with according to:
 - (1) any law in or outside Hong Kong, whether existing currently or in the future, including the laws relating to the detection, investigation and prevention of money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions or other unlawful activities, and/or acts or attempts to circumvent or violate these laws (collectively, the "Crime-countering Matters") (e.g. the Hong Kong Inland Revenue Ordinance requiring automatic exchange of financial account information amongst tax authorities in Hong Kong and overseas);
 - (2) any guideline, direction, demand or request given or issued by any local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, self-regulatory or industry bodies of financial institutions, or stock exchanges (collectively, the "Authorities and Organisations"), whether existing currently or in the future, including those relating to any law or Crime-countering Matters (e.g. guideline issued by the Hong Kong Inland Revenue Department on automatic exchange of financial account information);
 - (3) any present or future contractual or other commitment with any of the Authorities and Organisations that is assumed by or imposed on the Bank by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant Authority or Organisation; and
- comparing or matching personal data, whether or not for the purpose of taking adverse action against the data subject.

For example, we may use a data subject's personal data when the data subject:

- use our online platform – to process and evaluate the data subject's application, open and administer an account, verify the data subject's identity, provide banking or other financial services to the data subject, conduct credit checks and providing credit facilities to the data subject, assist other financial institutions to conduct credit checks, collect amounts from the data subject and pay amounts to the data subject, provide security for the data subject's obligations, design new financial services and products, detect, investigate and prevent fraudulent or criminal activities, malware, or unauthorised access to the data subject's account and make any disclosure or transfer that is permitted or required by law;
- apply for products/services and/or to open an account with us – to process and evaluate the data subject's application, open and administer an account, provide products/services to the data subject, conduct credit checks and providing credit facilities to the data subject, assist other financial institutions to conduct credit checks, collect amounts from the data subject and pay amounts to the data subject, provide security for the data subject's obligations, design new financial services and products, and make any disclosure or transfer that is permitted or required by law;
- are a signatory, shareholder or director or officer or guarantor of a corporation opening an account with us – to register the data subject as a signatory or guarantor and comply with legal requirements;
- apply for employment with us – to evaluate the data subject's application, administer payroll, benefits and taxation, performance evaluations, promotions, disciplinary matters, contingency planning, training, recruitment, diversity planning, provision of references to third parties, internal reorganisation of employees, and comply with legal requirements, and make any disclosure or transfer that is permitted or required by law; and
- send us correspondence – to respond to the data subject.

4. Our use of cookies

By accessing our online platform, you acknowledge that you have been informed of the practice of using cookies and authorise us to use any information collected through our use of cookies in connection with the purpose set out in this Privacy Policy. "Cookies" are data files stored on your electronic devices (such as your computer or mobile phone) after you access certain websites or mobile applications.

Cookies are primarily used to identify visitors when they return to a site, so that certain information already provided by the visitor to a site is not required to be provided again. Cookies are also used to gather data on which areas of a site or app are visited frequently and which are not. Keeping data on which areas of a site are most popular allows a site operator to better plan and enhance the site.

We use the following cookies:

Strictly Necessary Cookies: These are essential for the running of our website and mobile apps. They are required to:

- Allow our web server to determine the cookies setting and whether data can be collected from your web browser
- Temporarily allow you to carry information between pages in our website to avoid re-enter that information
- Temporarily identify your devices after log-in and maintain a dialogue between our web

server and your web browser in order to maintain certain activities

- We use the following Strictly Necessary Cookies:

_ga
_gat

Performance Cookies: These cookies are only used to improve our websites and identify issues that you may have when using our services. They help us to improve the customer experience and help us to provide better services to you. The information collected in these cookies are anonymous.

Functionality and Profile Cookies: These cookies help our website to remember your preferences and can help us to provide tailor services and features to you. These cookies may be used to ensure that all our services and communications are relevant to you. The tracking is only within PAObank websites or apps and the information in these cookies collect cannot track your browsing activity on other websites. Our website cannot remember your choices previously made or personalised your browsing experience without these cookies.

Marketing Cookies: These cookies and similar technologies are used to get the information about browsing habits. They remember a previous visit and may share this information with others, such as marketing companies and advertisers in order to deliver contents that are more relevant to your interests. Although these cookies and similar technologies are capable of tracking visits to other websites, they usually do not know who you are.

We acknowledge that you may wish to disable cookies. This can be done by changing your web browser settings, but may result in more limited functionality and you may not be able to utilise or activate certain functions available on our online platform.

5. Do we use personal data for direct marketing?

We do use some of the personal data we collect to send marketing material and special offers to the intended recipients via telemarketing, electronic means, direct mail or such other appropriate means, but only in accordance with the rules about direct marketing contained in the PDPO.

Personal data used in direct marketing may include the name, contact details, products and services portfolio information, transaction pattern and behaviour, geographic data and location data, financial background and demographic data of a data subject held by the Bank from time to time.

If we intend to use any personal data of a data subject for direct marketing purposes or provide any personal data of a data subject to third parties for direct marketing purposes, we will inform the data subject beforehand according to the PICS or in any other manner. We will provide the data subject with an opportunity to opt-out of direct marketing at that time.

If a data subject does not opt-out of direct marketing at that time, but the data subject later decides that he/she no longer wishes to receive direct marketing, he/she may ask us to cease any further direct marketing by contacting the Data Protection Officer at the address below.

The following classes of services, products and subjects may be marketed:

- financial, insurance, cards (including credit card, debit card, payment card and stored value card), banking and related services and products;
- reward, loyalty or privileges programmes and related services and products;
- services and products offered by the Bank'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

- donations and contributions for charitable and/or non-profit making organisations.

6. To whom do we disclose personal data?

Personal data held by us will be kept confidential but we may provide or disclose the personal data to third parties from time to time for the following purposes.

The classes of third parties to whom we may disclose a data subject's personal data are set out in the PICS.

Generally, we may disclose a data subject's personal data as necessary for:

- the purpose for which the data subject provided it to us;
- purposes which are directly related to the purpose for which the data subject provided it to us; and
- any other purposes to which the data subject has consented.

For example, we may disclose a data subject's personal data to:

- third party agents, contractors, advisors who provide administrative, communications, computer, payment, security or other services which assist us to carry out the above purposes (including telemarketers, mailing houses, IT service providers, data processors, etc.);
- our legal and professional advisors;
- our related companies (as that term is defined in the Companies Ordinance (Chapter 622 of the Laws of Hong Kong));
- any other person under a duty of confidentiality to the Bank including a group company of the Bank which has undertaken to keep the personal data confidential;
- government agencies and authorities as required by any law, regulation, rule or codes binding on us or our related companies; and
- any other person to whom the data subject has consented.

Where personal data is transferred to place(s) outside of Hong Kong in connection with such purposes, such place(s) may or may not offer the same or a similar level of personal data protection as in Hong Kong.

7. How is personal data secured?

We will take all reasonably practicable steps to ensure that personal data relating to a data subject is protected against unauthorised access, disclosure, processing, erasure, loss or use. These steps include restricting access to personal data to the relevant officers and employees of the Bank, providing relevant training to the officers and employees of the Bank regarding proper handling of personal data, and applying encryption or other technology to protect the personal data.

8. Retention of personal data

We will take all reasonably practicable steps to ensure that personal data relating to a data subject is not kept longer than is necessary for the fulfillment of the purposes for which the data is collected.

9. Access to and correction of personal data

A data subject may contact us to seek access to or seek to correct the personal data which we hold about him/her or enquire about our data privacy policies and practices. There are certain exemptions under the PDPO which may apply to personal data access and correction requests. We may require the person making a data access or correction request to provide necessary information to verify his/her identity and right to access or correct the personal data. We may charge an administration fee for complying with a data access request which must not be excessive.

Requests for access to or correction of personal data or enquiries about our data privacy policies and practices should be addressed to:

The Data Protection Officer

PAO Bank Limited
Room 1903-1904, NEO
123 Hoi Bun Road
Kwun Tong, Kowloon
Hong Kong

10. If there is any inconsistency between the English and Chinese versions of this Privacy Policy, the English version shall prevail.