



## Data Protection Policy - Singapore

Your privacy is important to us. This Data Protection Policy outlines how your Personal Data will be managed in accordance with the Personal Data Protection Act ("PDPA") which strives to protect personal data of individuals. Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we may collect, use and/or disclose your Personal Data.

You agree and consent to The Hongkong and Shanghai Banking Corporation Limited, Singapore Branch and our group companies (collectively referred to herein as "HSBC", "us", "we" or "our") as well as our respective agents, authorised service providers and relevant third parties collecting, using, disclosing and/or sharing your Personal Data in the manner set forth in this Data Protection Policy. In this Data Protection Policy, "group companies" refers to HSBC Holdings plc and/or any of its affiliates, subsidiaries, associated entities and any of their branches and offices, such as HSBC Insurance (Singapore) Pte Limited, HSBC Bank (Singapore) Limited, HSBC Global Asset Management (Singapore) Limited, HSBC Trustee (Singapore) Limited, HSBC Institutional Trust Services (Singapore) Limited, HSBC International Trustee Limited, Singapore Branch and **Hang Seng Bank Limited, Singapore Branch**.

This Data Protection Policy supplements but does not supersede nor replace any other consents which you may have previously provided to us nor does it affect any rights that we may have at law in connection with the collection, use and/or disclosure of your Personal Data. We may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. If any material revision is made to this Data Protection Policy, updates will be published. Subject to your rights at law, the prevailing terms of the Data Protection Policy shall apply.

For the avoidance of doubt, this Data Protection Policy forms a part of the terms and conditions governing your relationship with us and should be read in conjunction with such terms and conditions ("**Terms and Conditions**"). In the event of any conflict or inconsistency between the provisions of this Data Protection Policy and the Terms and Conditions, the provisions of the Terms and Conditions shall prevail.

### **1. Your Personal Data**

In this Data Protection Policy, "Personal Data" refers to any data or information about you from which you can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access. Examples of such Personal Data include:

a. your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to you which you have provided us in any forms you may have submitted to us, or in other forms of interaction with you;



- b. information about your use of HSBC's website and services, including cookies, IP address, policy and claims history information;
- c. your employment history, education background, and income levels;
- d. your transaction related information, such as your bank account or credit card information, and your credit history; and
- e. information about your usage of and interaction with our website and/or services including computer and connection information, device capability, bandwidth, statistics on page views, and traffic to and from our website.

## **2. Collection of Personal Data**

2.1 Generally, HSBC may collect your Personal Data in the following ways:

- a. when you register with us for an account;
- b. when you access our website or perform an online transaction;
- c. when you interact with any of our employees (including customer service officers);
- d. when you submit an application to us to purchase our products or use our services;
- e. when you respond to our request for additional Personal Data;
- f. when you ask to be included in an email or other mailing list;
- g. when you request that we contact you;
- h. when you respond to our initiatives or promotions; and
- i. when you submit your Personal Data to us for any other reason.

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2.2 When you browse our website, you generally do so anonymously, but please see section 6 below on cookies.

## **3. Purposes for the Collection, Use and Disclosure of Your Personal Data**

3.1 Generally, HSBC may collect, use and/or disclose your Personal Data for the following purposes:

- a. evaluating and providing advice and/or recommendations to you regarding the type of products and services suited to your needs;



- b. assessing and processing any applications or requests made by you for products and services offered by HSBC;
- c. communicating with you to inform you of changes and updates to our policies, terms and conditions and other administrative information, including without limitation for the purposes of servicing you in relation to products and services offered to you;
- d. administering, maintaining, managing and operating the products and services offered to you, including government-driven schemes;
- e. processing and administering benefits or entitlements in connection with our services which you have applied for, including the administration of loyalty and rewards programmes;
- f. verification of your identity for the purpose of providing you with our services;
- g. responding to your queries and requests and handling complaints;
- h. providing you with personalised service, including at our customer service touchpoints;
- i. conducting market research for statistical profiling and other purposes to understand and determine customer preferences and demographics in order for us to review, develop and improve the products and services which we are providing to you (including without limitation to ensure that the products and services offered are relevant to you);
- j. conducting financial reporting and analysis related to our business operations;
- k. managing our infrastructure and business operations and complying with internal policies and procedures;
- l. archival of documents and records in both electronic and physical form for record keeping purposes;
- m. maintaining records of customer instructions, whether through phone recordings, hard copy documents, soft copy documents or instructions given via electronic or other means;
- n. conducting credit checks and ensuring your ongoing creditworthiness, and the collection of amounts outstanding from you and any person providing security or guarantees for your obligations;
- o. determining the amount of indebtedness owed to or by you;
- p. facilitating business asset transactions (which may extend to any merger, acquisition or asset sale) involving any HSBC group company;
- q. facilitating the verification and checks of your Personal Data in order to provide you with our products and services which you have requested;



r. preventing, detecting and investigating crime, including fraud and any form of financial crime, and analysing and managing other commercial risks;

s. compliance with any applicable local or foreign statute, rule, law, regulation, judgment, decree, directive, code of practice, guideline, administrative requirement, sanctions regime, court order, agreement between any HSBC group company and an Authority (as defined in section 5.1(k) of this Data Protection Policy), agreement or treaty between Authorities, international guidance and internal policies or procedures, which may apply to any HSBC group company or which any such company is subject to, or to assist in or with law enforcement and investigations by any Authority or to comply with any request from an Authority; and

t. subject to applicable law, any other purpose set out in the Terms and Conditions.

You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with products and services you have requested.

Where personal data is submitted by you on behalf of another individual or concerns another individual other than yourself (or, in the case of situations where you, as a representative of your company or organisation, are submitting the personal data of individuals as part of the disclosures by the company or organisation to us), you represent and warrant to us that all the necessary consents (procured in accordance with all applicable data protection legislation, including without limitation the PDPA, for such purposes stated in the relevant sections of this Data Protection Policy) have been obtained from the relevant individuals and that you have retained proof of these consents, such proof to be provided to us upon our request.

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3.2 In addition, HSBC may collect, use and/or disclose your Personal Data for the following purposes, depending on the nature of our relationship with you as well as the type of account you hold with us:

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3.3 If you are a retail banking account holder, HSBC may collect, use and/or disclose your Personal Data for the following purposes:

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a. processing and sending / receiving documents in respect of applications for products and services (including without limitation applications for Personal Instalment Loan, Personal Line of Credit, cards and bundled services, whether online or otherwise);

b. creation and maintenance of your account (including without limitation data entry);



- c. the executing and processing of your instructions to us including without limitation for withdrawals, deposits, settlements, reconciliation of accounts, processing instructions in respect of account tools and services including without limitation cheques, online services and debit and credit cards;
  - d. the issuing / printing of account statements; and
  - e. any other purpose directly relating to any of the above.
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3.4 If you are an insurance policy holder, HSBC may collect, use and/or disclose your Personal Data for the following purposes:

- a. processing and sending /receiving documents in respect of your insurance application;
  - b. administering, maintaining, managing and operating the products and services offered to you, including reinsured products by other companies and government-driven schemes;
  - c. sending updates and administrative notices to you in relation to the products and services used by you, including notification of maturity of payments and maturity of policies;
  - d. underwriting of policy risks;
  - e. assessing and processing of any claims arising under your policy;
  - f. collecting premiums and debt collection; and
  - g. any other purpose directly relating to any of the above.
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3.5 If you are an investment account holder, HSBC may collect, use and/or disclose your Personal Data for the following purposes:

- a. creation and maintenance of your investment account;
  - b. processing of applications for investment products, investment product instructions (including without limitation redemption and switching) and settlement of trades; and
  - c. any other purpose directly relating to any of the above.
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3.6 If you are a Private Bank customer, HSBC may collect, use and/or disclose your Personal Data for the following purposes:



- a. creation and maintenance of your account;
  - b. preparation of the relevant documentation for the products and services used by you, including the preparation of facility letters and security documents, insurance policies and mortgages, or communications in connection therewith;
  - c. the executing and processing of your instructions to us including without limitation for withdrawals, deposits, settlements, reconciliation of accounts, processing instructions in respect of account tools and services, including without limitation cheques, online services and debit and credit cards;
  - d. the issuing / printing of account statements;
  - e. processing (including verification of orders and instructions, securing regulatory and internal approvals) and settlement of transactions including those in connection with investment products and discretionary programs, portfolio review, administration and trade planning, trusts administration services; and
  - f. any other purpose directly relating to any of the above.
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3.7 If you are a beneficial owner or stakeholder (including any settlor, grantor, donor, contributor, founder, sponsor, issuer or beneficiary) in respect of any trust, estate or legal person administered by a HSBC trustee company (such as HSBC Trustee (Singapore) Limited or HSBC International Trustee Limited, Singapore Branch), HSBC may collect, use and/or disclose your Personal Data (and the Personal Data of beneficiaries and any other parties required to administer the trust) for the following purposes:

- a. preparation of the relevant documentation for the services used by you, and communications in connection therewith;
  - b. processing (including verification of orders and instructions, securing regulatory and internal approvals) and conducting of trusts administration services; and
  - c. any other purpose directly relating to any of the above.
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3.8 If you are a corporate customer (in the case of Sole Proprietorship or Partnership) or a representative of a corporate customer or corporate account holder, HSBC may collect, use and/or disclose your Personal Data for the following purposes:

- a. administering, maintaining, managing and operating the products and services offered to you (in the case of Sole Proprietorship or Partnership) or the corporation or company of which you are a representative;





- b. processing and executing the instructions issued by you (in the case of Sole Proprietorship or Partnership) or the corporation or company of which you are a representative (including without limitation verification of orders and instructions, securing regulatory and internal approvals);
  - c. preparation of the relevant documentation for the products and services used by you (in the case of Sole Proprietorship or Partnership) or the corporation or company of which you are a representative, and communications in connection therewith; and
  - d. any other purpose directly relating to any of the above.
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3.9 If you are a guarantor or a third party security provider of a customer of HSBC, HSBC may collect, use and/or disclose your Personal Data for the following purposes:

- a. facilitating the daily operation of the products, services and credit facilities to be provided to the customer in respect of which/whom you are a guarantor and/or third party security provider;
  - b. processing loan applications submitted by the customer in respect of which/whom you are a guarantor and/or third party security provider;
  - c. providing loans and overdraft facilities (including without limitation the evaluation of credit risks and enforcement of repayment obligations) to the customer in respect of which/whom you are a guarantor and/or third party security provider; and
  - d. any other purpose directly relating to any of the above or in connection with the guarantee and/or third party security provided by you.
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3.10 If you do not interact with us in the manners specified above, we may collect, use and/or disclose your Personal Data for the following purposes, in accordance with the PDPA:

- a. the purposes for which we have specifically obtained your consent: and
- b. the purposes for which you have provided your Personal Data to us.

#### **4. Marketing / Optional Purposes**

4.1 Where you have specifically provided us with additional consents, HSBC may also collect, use and/or disclose your Personal Data for the following purposes:



- a. providing benefits to you, including without limitation promotions, loyalty and reward programmes and sending you details of products, services, special offers and rewards, either to our customers generally, or which may be of interest to you;
- b. matching your Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of products and services, whether by any HSBC group company, or other third parties;
- c. fulfilling your referral requests;
- d. administering contests and competitions;
- e. participation in HSBC's marketing initiatives;
- f. participation in HSBC's branding activities (including without limitation written or video/audio recordings of your quotes and testimony for media pitching, press releases and HSBC's internal publications and broadcasts );
- g. invitations to participate in HSBC's corporate sustainability activities, and the video/audio recording of your feedback and testimony in relation thereto; and
- h. developing special offers and marketing programmes.

If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, we may contact you using such Singapore telephone number(s) (including via voice calls, SMS, fax or other means) with information about our products and services (including discounts and special offers).

## **5. Disclosure of Personal Data**

5.1 Personal Data will be protected and kept confidential but, subject to the provisions of any applicable law, may be disclosed for the purposes listed above (where applicable) to the following parties:

- a. HSBC group companies;
- b. companies providing services relating to insurance and/or reinsurance to HSBC;
- c. private investigators, hospitals or clinics in connection with claims or underwriting assessment;
- d. associations of insurance companies, including the Life Insurance Association Singapore;
- e. agents, contractors or third party service providers who provide services, such as telecommunications, call centre, mailing, information technology, payment, payroll, data processing, training, market research, storage and archival, to HSBC;





- f. the Credit Bureau, or in the event of default or disputes, any debt collection agencies or dispute resolution centres (whether in Singapore or otherwise) such as the Financial Industry Disputes Resolution Centre Ltd;
- g. any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving HSBC;
- h. any liquidator, receiver, official assignee / trustee, judicial manager or any other person appointed under or pursuant to any applicable law or court order in connection with the bankruptcy, liquidation, winding up, judicial management or any other analogous process in respect of any individual, company or business;
- i. banks, financial institutions, credit card companies and their respective service providers;
- j. our professional advisers such as our auditors and lawyers;
- k. any judicial, administrative or regulatory body, any government or public or government agency, instrumentality or authority, any domestic or foreign tax, revenue, fiscal or monetary authority or agency, securities or futures exchange, self-regulatory organization, trade repositories, central counterparties, court, central bank or law enforcement body or any agents thereof, having jurisdiction over any HSBC group company (collectively referred to as "Authorities" and each an "Authority");
- l. operators of payment systems, such as the Singapore Clearing House Association, Network for Electronic Transfers (Singapore) Pte Ltd., their member banks and third party financial institutions as well as credit card companies such as Visa Inc, Mastercard Inc, American Express Inc, and securities and investment services providers in connection with any payments, charges or other related instructions you may issue, as well as recipients of these payments and charges;
- m. any trade or merchant, or any other party accepting use of the ATM card and their agents or contractors in respect of transactions using the ATMs of banks or financial or non-financial institutions;
- n. any business alliance partner, insurance broker and direct or indirect provider of credit protection as may be necessary for the carrying out of the purposes set forth above;
- o. third party reward, loyalty, privileges and co-branding programme providers;
- p. co-branding partners of HSBC (the names of such co-branding partners will be provided during the application of the relevant services and products, as the case may be); and
- q. any other person in connection with the purposes set forth above.

## **6. Use of cookies**



6.1 We may collect or analyse anonymised information from which individuals cannot be identified ("Aggregate Information"), such as number of users and their frequency of use, the number of page views (or page impressions) that occur on our websites and common entry and exit points into our websites.

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6.2 We use "cookies", where a small data file is sent to your browser to store and track Aggregate Information about you when you enter our websites. The cookie is used to track information such as the number of users and their frequency of use, profiles of users and their preferred sites.

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6.3 The Aggregate Information collected is used to assist us in analysing the usage of our websites and improving our websites.

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6.4 Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our websites.

## **7. Withdrawal of Consent**

If you wish to withdraw your consent to any use or disclosure of your Personal Data as set out in this Data Protection Policy, you may contact us via our customer service hotlines.

Please note that if you withdraw your consent to any or all use or disclosure of your Personal Data, depending on the nature of your request, we may not be in a position to continue to provide our products or services to you or administer any contractual relationship in place. Such withdrawal may also result in the termination of any agreement you may have with us. HSBC's legal rights and remedies are expressly reserved in such event.

## **8. Access and Correction of your Personal Data**

You may request access to or make corrections to your Personal Data records, but HSBC has the right to charge a reasonable fee for processing your request. Please submit your request to the respective Data Protection Officer through email at [hasesg.customer.opinions@hangseng.com](mailto:hasesg.customer.opinions@hangseng.com) for us to proceed.



恒生銀行  
HANG SENG BANK

## 9. Contacting Us

If you have any questions or complaints relating to the use or disclosure of your Personal Data, or if you wish to know more about our data protection policies and practices, please contact the respective Data Protection Officer through email at [hasesg.customer.opinions@hangseng.com](mailto:hasesg.customer.opinions@hangseng.com).