

PRIVACY NOTICE

FOR HSBC BANK (VIETNAM) LTD.

Version:

This Privacy Notice (“**Privacy Notice**”) forms part of the General Terms and Conditions governing the relationship between HSBC Bank (Vietnam) Ltd., (hereinafter collectively referred to as “**HSBC Vietnam**”, “**we**”, “**our**”, or “**us**”) and our customers, prospective customers and connected parties (hereinafter collectively referred to as “**you**”, “**your**”). The Privacy Notice should be read in conjunction with those General Terms and Conditions.

The Privacy Notice is applied for us, as a Personal Data controller and/ or Personal Data processor, and explains which information we collect, how we use the information, who we share the information with and retention of the information to keep it confidential and privileged.

1. What Personal Data We May Collect

“**Personal Data**” refers to information in the form of symbols, letters, numbers, images, sounds, or equivalences associated with an individual or used to identify an individual. Personal Data that we collect about you is information necessary for the provision of our products or services (“**Products**”, “**Services**”), and for other purposes as provided in the Privacy Notice, including:

“**The basic Personal Data**”: We may collect the basic Personal Data from you, including but not limited to:

- a. Identification data: Full name, address, email address, date of birth, place of birth, national ID, passport information and other identification information related to an individual you provided to us;
- b. Personal relationship data: Marital status, information about the individual’s family relationship (parents, children);
- c. Professional data: Information about your educational or professional background
- d. Behavioural data: Your digital account information, your Personal Data that reflects activities and activity history in cyberspace; and
- e. Other basic Personal Data associated with an individual or used to identify an individual;

“**The sensitive Personal Data**”: Some information we collect may be sensitive Personal Data, but we collect sensitive Personal Data only with your consent and/or in strict compliance with the applicable laws.

Sensitive Personal Data refers to personal data in association with individual privacy which, when being infringed, will directly affect an individual's legal rights and interests, including but not limited to:

- a. Financial and commercial data: Information on customers of credit institutions, foreign bank branches, payment service providers and other licensed institutions, including: customer identification as prescribed by law, accounts, deposits, deposited assets, transactions, organizations and individuals that are guarantors at credit institutions, bank branches, and payment service providers;
- b. Health data: Health condition and personal information stated in health record;
- c. Ethnic origin data: Information about genetic data related to your inherited or acquired genetic characteristics.;
- d. Biometric data: Biometric or biological characteristics that are distinctive and stable of a person, used to identify and distinguish such person from another one. Biometric identifiers include portrait pictures, fingerprints, irides, ADN, voice;
- e. Data on crimes and criminal activities collected and stored by law enforcement agencies;
- f. Geo-location data: Personal location identified via location services; or
- g. Other sensitive Personal Data related to you.

We may collect and combine your Personal Data on a case-by-case basis, including but not limited to:

- a. when you or your employer, corporate representatives provide to us;
- b. when you visit our websites, uses HSBC Vietnam's Products, Services and applications;
- c. when we collect from a public source, credit scoring, debt collection activities, competent authorities and our business partners and/or other third parties.

If you provide us with someone else's Personal Data, you must obtain their consent as required by applicable laws and explain to them and ensure that they understand how we shall process their Personal Data.

2. How We Will Process Personal Data

We may process Personal Data for the following purposes set out in the list below ("**Purposes**"), including but not limited to:

- a. Verify the accuracy and correctness of information provided; identify or authenticate your identity and perform customer verification processes;
- b. Processing your application for any Products, Services offered or distributed by us (including but not limited to third party products such as investment products, and insurance policies);

- c. Evaluate your credit and eligibility profile in relation of using our Products, Services;
- d. Provide Products, Services of HSBC Vietnam and HSBC Group companies;
- e. Interact with you to provide communication, deliver bills, statements, reports, and/or other relevant documents;
- f. Manage and evaluate our business including design and improve our Products, Services, or perform marketing communication;
- g. Generate financial, management or other related reports under the applicable laws;
- h. Exploit the information in national data center the in accordance with the applicable laws and regulations;
- i. Conduct checks with the Do Not Call or equivalent Registry (if any); conduct market research, surveys and data analysis relating to any Products, Services provided by us (whether conducted by HSBC Vietnam or jointly with another party) which may be relevant to you;
- j. Protect our legitimate interest and comply with laws, regulations including prevention of fraud, financial crimes and/or other crimes; meet compliance obligations imposed on HSBC Vietnam and HSBC Group companies;
- k. Prevent or suppress danger to a person's life, health and public interests;
- l. Purposes which are reasonably related to the aforesaid.

If we process your Personal Data for the purposes other than the Purposes, we shall inform you how we process this Personal Data and obtain your consent before processing your Personal Data for such additional purposes as per applicable laws and regulations.

For the fulfillment of the above Purposes, we will process your Personal Data by performing one or more activities, such as collection, recording, analysis, confirmation, storage, correction, disclosure, combination, access, retrieving, revoking, encryption, decrypting, copying, sharing, transmitting, providing, transferring, deleting, destroying Personal Data or other related actions.

3. Who We Might Share Personal Data With

For the fulfillment of the Purposes outlined in the Privacy Notice, we may share Personal Data to the following third parties:

- a. HSBC Group companies;
- b. Any sub-contractors, agents, business partners, advertising companies, volunteer and non-profit organizations of HSBC Group (including their employees, directors and officers);
- c. Local and overseas law enforcement agencies, competent authorities;

- d. Anyone acting on customers' behalf, payment recipients, beneficiaries, account agents, correspondent and agent banks, clearing houses, clearing or settlement systems, or anyone making any payment to customers;
- e. Other third parties who you consent us to or there are other legal grounds to share your data with.

4. Transferring Personal Data Overseas

For the fulfillment of the Purposes outlined in the Privacy Notice, we may transfer Personal Data to our third parties, whether in Vietnam or overseas.

When we transfer Personal Data, HSBC Vietnam will require the recipient to ensure that Personal Data disclosed to them is kept confidential and secure. We comply with our legal and regulatory obligations in relation to transferring Personal Data.

5. Personal Data Retention and Secure

Personal Data held by HSBC Vietnam shall be kept confidential. We use reasonable measures to protect Personal Data. To the extent permitted by law, we may store Personal Data in Vietnam or overseas, including on the Cloud. We maintain HSBC Group data protection standards in accordance with the applicable laws.

We retain Personal Data for the period necessary to fulfill the Purposes outlined in the Privacy Notice unless a longer retention period is required or allowed by the applicable laws.

6. Data Subject Rights and Obligations

To the extent permitted by law, you may exercise your rights by contacting us via the contact details provided in Section 7 under the Privacy Notice.

- a. **Right to be informed:** You can be informed of your Personal Data processing;
- b. **Right to give consent:** You can give or not the consent to your Personal Data processing;
- c. **Right to access:** You can access your Personal Data in order to see, rectify or request us to rectify your Personal Data;
- d. **Right to withdraw consent:** You can withdraw the consent to processing your Personal Data.
- e. **Right to delete:** You can delete or request deletion of your Personal Data, unless otherwise provided for by law;
- f. **Right to restrict on processing:** You can obtain restriction on the processing of your Personal Data, unless otherwise provided for by law;

- g. Right to be provided Personal Data:** You can request us to provide your Personal Data, unless otherwise provided for by law;
- h. Right to object processing Personal Data:** You can object processing your Personal Data in order to prevent or restrict the disclosure of Personal Data or the use of Personal Data for advertising and marketing purposes;
- i. Right to file complaints, denunciations and lawsuits;**
- j. Right to claim damages; and**
- k. Right to self-protection.**

You should be also mindful that exercising on your rights above, may render our Products and Services limited, restricted, suspended, canceled, prevented, or prohibited. As a result, exercising on your rights above may also be considered as a termination by you of any contractual relationship which you may have with us, and our legal rights and remedies in such event are expressly reserved.

You have the following obligations with respect to Personal Data:

- a. Protect your own Personal Data, request relevant organizations and individuals to protect your Personal Data;
- b. Respect and protect others' Personal Data;
- c. Fully and accurately provide your Personal Data when you consent to Personal Data processing;
- d. Participate in disseminations of Personal Data protection skills;
- e. Comply with regulations of law on protection of Personal Data and prevent violations against regulations on protection of Personal Data;
- f. Other obligations regulated under the applicable laws and regulations.

7. Contact Us

HSBC Bank (Viet Nam) Ltd

Address: Floor 1, 2, 6 Metropolitan, 235 Dong Khoi Street, Ben Nghe Ward, District 1, Ho Chi Minh City, Vietnam.

- a. Contact Center
 - Personal Banking customers: (84 28) 37 247 247 (the South) or (84 24) 62 707 707 (the North)
 - Platinum Cash Back, HSBC Live+ and TravelOne Credit Card holders (24/7): (84 28) 37 247 248
 - Premier customers (24/7): (84 28) 37 247 666

b. Email us:

- Personal Banking customers: direct@hsbc.com.vn
- Premier customers: hsbcpremiervn@hsbc.com.vn

8. Amendments and Updates

HSBC Vietnam may modify, update or amend the content of this Privacy Notice at any time we deem necessary. These modification, update of the Privacy Notice will be published in our official websites.