

**DBS Bank Group**  
**Data Policy Notice for Hong Kong Operations**

The Hong Kong operations of DBS Bank Ltd, ("DBS") and its various Hong Kong subsidiaries are committed to protecting data privacy in accordance with applicable Hong Kong legal and regulatory requirements. Accordingly, each of DBS and such subsidiaries (singly a "Company" and collectively "the DBSHK Group"), including DBS Bank (Hong Kong) Limited, adheres to the data policy of the DBSHK Group that applies in Hong Kong and is set out in this Notice.

This Notice is provided to notify data subjects of the data policies of the DBSHK Group.

- (a) The provisions of this Notice form part of the account terms and conditions and/or the agreement or arrangements that a data subject has or may enter into with any Company. If any inconsistency is found, the provisions of this Notice shall prevail.
- (b) From time to time, it is necessary for data subjects to supply the relevant Company with data in connection with various matters such as the opening or continuation of accounts and the establishment, provision or continuation of banking facilities, banking and other financial services by any Company or the provision of supplies or service to any Company and data subjects.
- (c) Failure to supply such data may result in the Company being unable to open or continue accounts or establish or continue banking facilities or provide banking or other financial services, or accept or continue with the provision of supplies or service to the Company and data subjects.
- (d) It is also the case that data are collected from data subjects in the ordinary course of the continuation of the relationships with them, for example, when data subjects write cheques, deposit money or give instructions.
- (e) The purposes for which data relating to a data subject may be used will vary depending on the nature of the data subject's relationship with the relevant Company. Broadly, they may comprise any or all of the following purposes:
  - (i) processing of applications for banking and/or other financial services and facilities;
  - (ii) operation of the services and credit facilities provided by or to the relevant Company or to data subjects with or without provision of a card;
  - (iii) provision of reference (status enquiries);
  - (iv) conducting credit and other status checks;
  - (v) assisting other financial institutions to conduct credit checks and collect debts;
  - (vi) ensuring ongoing credit-worthiness of data subjects;
  - (vii) researching, designing financial services or related products for data subjects' use;
  - (viii) marketing the following services and products (in respect of which the relevant Company may or may not be remunerated):
    - (1) financial, insurance, 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 the relevant Company'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) the relevant Company and any Bank Group Company;
    - (2) third party financial institutions, insurers, card companies, securities and investment services providers;
    - (3) third party reward, loyalty or privileges programme providers; and
    - (4) co-branding partners of the relevant Company and any Bank Group Company;
  - (ix) operating internal controls including determining the amount of indebtedness owed to or by data subjects;
  - (x) performing treasury functions;
  - (xi) provision of investment management services, dealing and advisory services, custody services and other services under the terms and conditions of the accounts a data subject holds with the Company;
  - (xii) the enforcement of data subjects' obligations, including without limitation the collection of amounts outstanding from data subjects and those providing security for data subjects' obligations;
  - (xiii) for operational purposes, credit assessment, credit scoring models or statistical analysis (including in each case, behaviour analysis and evaluation on overall relationship with the DBS Bank Group), whether on the data subjects or otherwise;
  - (xiv) meeting the requirements to make disclosure under the requirements of any applicable law, regulation or court order binding on or applying to or to which the relevant Company or any of its branches is subject, or under and for the purpose of any guidelines issued by regulatory or other authorities with which the relevant Company or any of its branches is expected to comply;
  - (xv) meeting the requirements to make disclosure under the requirements of any law, regulation or court order binding on or applying to or to which a Bank Group Company or any of its branches is subject, or under and for the purpose of any guidelines issued by regulatory or other authorities with which the relevant Bank Group Company or any of its branches is expected to comply (but only insofar as such requirement for disclosure of data by a Bank Group Company relates to data already held by such Bank Group Company on behalf of the Company at the time the need for disclosure arises but not any other data);
  - (xvi) enabling an actual or proposed assignee of the Company or a Bank Group Company, or participant or sub-participant of the rights of the Company or those of a Bank Group Company in respect of the data subject, to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation;
  - (xvii) purposes specifically provided for in any particular service or facility offered by the Company. Such procedures

include matching procedures (as defined in the Ordinance, but broadly includes comparison of two or more sets of the data subject's data, for purposes of taking actions adverse to the interests of the data subject, such as declining an application); and

(xviii) all other incidental and associated purposes relating any of the above.

The Company keeps data only for as long as is reasonably required for the above purposes or as required by applicable law.

- (f) Data held by any relevant Company relating to a data subject will be kept confidential but the relevant Company may provide such information to the following categories of persons for any of the purposes set out in paragraph (e):
- (i) any Bank Group Company, agent, contractor or third party service provider (or a subsidiary, holding company or related company thereof) who provides administrative, telecommunications, computer, payment, debt collection or securities clearing, data processing or other services to the Company or a Bank Group Company in connection with the operation of its business;
  - (ii) any other person (including a Bank Group Company) which has undertaken expressly or impliedly to the Company or a Bank Group Company to keep such information confidential;
  - (iii) any authorized institution (as such term is defined in the Banking Ordinance) or other authorised or regulated entity of similar nature in another jurisdiction with which the data subject has or proposes to have dealings;
  - (iv) the drawee bank providing a copy of a paid cheque (which may contain information about the payee) to the drawer;
  - (v) credit reference agencies, and, in the event of default, to debt collection agencies;
  - (vi) subject to paragraph (e)(xv) any person to whom the Company or a Bank Group Company is under an obligation to make disclosure under the requirements of any law, regulation or court order binding on or applying to or to which the Company or a Bank Group Company or any of its branches is subject, or under and for the purposes of any guidelines issued by regulatory or other authorities with which the Company or a Bank Group Company or any of its branches is expected to comply;
  - (vii) any actual or proposed assignee of the Company or a Bank Group Company, or participant or sub-participant or transferee of the rights of the Company or those of a Bank Group Company in respect of the data subject; and
  - (viii) (1) a Bank Group Company;
    - (2) third party financial institutions, insurers, card companies, securities and investment services providers;
    - (3) third party reward, loyalty and privileges programme providers;
    - (4) co-branding partners of the relevant Company and any Bank Group Company (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) external service providers (including but not limited to mailing houses, telecommunication companies, telemarketing and direct sales agents, call centres, data processing companies, information technology companies and market research firms)that the Company engages for the purposes set out in paragraph (e)(viii).

The Company may disclose data to any or all of the parties stated above and may do so notwithstanding that the recipient's place of business is outside Hong Kong including Singapore, or that such information following disclosure will be collected, held, processed or used by such recipient (including the DBS Bank Group) in whole or part outside Hong Kong.

Without limiting the generality of paragraph (e) and this paragraph (f), the Company will disclose data to the DBS Bank Group and/or to any other party who, in each case, may from time to time be duly appointed to carry out data processing, analysis or other services, provided that, in each case, the applicable legal, Hong Kong Monetary Authority and other regulatory requirements have been complied with.

- (g) For the purpose of (e)(iv) above, the Company may from time to time access and obtain consumer credit data of the data subject from a credit reference agency for reviewing any of the following matters in relation to the credit facilities granted:
- (i) an increase in the credit amount;
  - (ii) the curtailing of credit (including the termination of credit or a decrease in the facility amount); or
  - (iii) the putting in place or the implementation of a scheme of arrangement with the data subject.

When the Company accesses consumer credit data about a data subject held with a credit reference agency, it must comply with the Code and other relevant regulatory requirements.

- (h) Under and in accordance with the terms of the Ordinance and the Code, any data subject has the right:
- (i) to check whether the Company holds data about him/her and of access to such data;
  - (ii) to require the Company to correct any data relating to him/her which is inaccurate;
  - (iii) to ascertain the Company's policies and practices in relation to data and to be informed of the kind of personal data held by the Company; and
  - (iv) in relation to consumer credit data which has been provided by the Company to a credit reference agency:
    - (1) to request to be informed which items of data are routinely disclosed to credit reference agencies or debt collection agencies;
    - (2) be provided with further information to enable an access and correction request to be made to the relevant credit reference agency or debt collection agency; and
    - (3) to ask the Company to request the relevant credit reference agencies to delete any account data (which extended to consumer credit involving mortgage(s) from 1st April 2011) upon the termination of the account by full payment, if there is no payment default in excess of 60 days in the past 5 years. If he/she has any such payment default in excess of 60 days, account repayment data may be retained by the relevant credit reference agencies until 5 years from the final settlement date of the default amount or 5 years from the date

of discharge of his/her bankruptcy as notified to the credit reference agency whichever is earlier.

- (i) Under and in accordance with the terms of the Ordinance and the Code, on or after 1st April 2011, of all the data which may be collected or held by the Company from time to time in connection with mortgages, the mortgage account general data relating to data subjects (including any updated data thereof) will be provided by the Company to the credit reference agency. The credit reference agency will use the mortgage account general data supplied by the Company for the purposes of compiling a count of the number of mortgages from time to time held by a data subject, as borrower, mortgagor or guarantor respectively, for sharing in the consumer credit database of the credit reference agency by credit providers.
- (j) The relevant Company may charge a reasonable fee for the processing of any data access request.
- (k) Nothing in this Notice shall limit the rights of data subjects under the Personal Data (Privacy) Ordinance.
- (l) The Company may obtain a credit report on or access the database of the data subject from a credit reference agency in considering any application for credit or conducting credit reviews from time to time. In the event the data subject wishes to access the credit report, the Company will advise the contact details of the relevant credit reference agency.
- (m) In accordance with the Ordinance, data subjects may make data access or data correction requests or request information regarding policies and practices and kinds of data held. Such requests should be addressed to:
- The Data Protection Officer  
DBS Bank Ltd., Hong Kong Branch / DBS Bank (Hong Kong) Limited  
10/F One Island East,  
18 Westlands Road  
Island East, Hong Kong
- (n) In this Notice, the following terms shall have the following meanings:
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| "account data",<br>"account repayment data",<br>and "consumer credit data" | Bear the same meanings given to them under the Code;   |
| "Bank Group Company"   | Means any subsidiary of the Company, any direct or indirect holding company of the Company, any subsidiary of any such holding company or any of their related companies (being a company in which an equity interest is held by any of the foregoing) including companies within the DBS Bank Group;  |
| "card"   | Means any plastic card which may be used to pay for goods and services or to withdraw cash. Common examples include credit cards, debit cards, ATM cards, Cashline cards and stored value cards;   |
| "Code"   | Means the Code of Practice on Consumer Credit Data approved and issued under the Ordinance. The Code may be obtained from the public website of the Office of the Privacy Commissioner for Personal Data, Hong Kong ( <a href="http://www.pcpd.org.hk">www.pcpd.org.hk</a> );  |
| "data subjects"  | Means customers of the Company and various other persons (including, without limitation, applicants for banking services and facilities, sureties, corporate officers and managers, suppliers, contractors, service providers and other contractual counterparties) supplying data (including personal data (as such term is defined in the Ordinance)) to the Company;  |
| "DBS Bank Group"   | A banking group the holding company of which is incorporated in Singapore;   |
| "Hong Kong"  | The Hong Kong Special Administrative Region;   |
| "mortgage account general data"  | Bears the same meaning given to it under the Code, being the following data of the data subject: full name, capacity in respect of each mortgage (as borrower, mortgagor or guarantor), Hong Kong Identity Card or travel document number, date of birth, address, mortgage account number in respect of each mortgage, type of facility in respect of each mortgage, mortgage account status in respect of each mortgage (e.g. active, closed, write-off), (if any) mortgage account closed date in respect of each mortgage; |
| "Ordinance"  | The Personal Data (Privacy) Ordinance;   |
| "subsidiary" and "holding company"   | Bear the same meanings given to them under the Companies Ordinance.  |

You may, at any time and without charge, choose not to receive any direct marketing material from the Company. If you choose not to receive direct marketing material from the Company, please fill out the form below and return to us (applicable to personal customers only). Your request shall apply to all accounts (excluding sole proprietorship or partnership account(s) related to you) maintained by you at the Company. For sole proprietorship or partnership account(s), please complete separate form(s) and indicate the relevant account number(s).

In case of discrepancies between the English and Chinese versions, the English version shall prevail.

June 2011

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**Opt-out Processing Request Form for Customers of  
DBS Bank (Hong Kong) Limited**

Date: \_\_\_\_\_

To: DBS Bank (Hong Kong) Limited  
GPO Box 400  
Hong Kong  
(Opt-out Request Processing Team)

I **do not wish** to receive any direct marketing material or message from the Company via the following channel(s)\* :

Email, Please provide Email Address(es): \_\_\_\_\_

SMS, Please provide Mobile Phone number(s): \_\_\_\_\_

All channels (including Email, Mail, SMS, Phone)

Name: \_\_\_\_\_

HKID/Passport Number: \_\_\_\_\_

Account Number: \_\_\_\_\_

Customer's Signature: \_\_\_\_\_

\* If you do not indicate your choice by ticking any of the above boxes, you are deemed to select "All channels".

If you have already provided your opt out request to us, please do not send the same request to us again to avoid duplication.