BPI International Finance Limited

Privacy Statement and Security Advice

Part A. Privacy Statement

1. **Introduction**

The purpose of this Statement is to set out the policies and practices of BPI International Finance Limited ("BPI IFL", the "Company", "we", "our" or "us") and our commitment to protect personal data privacy in accordance with the provisions of the Personal Data (Privacy) Ordinance ("Ordinance").

2. Notice Relating to the Personal Data (Privacy) Ordinance (the 'Ordinance')

This Notice is served by BPI IFL in accordance with the Personal Data (Privacy) Ordinance of the Hong Kong Special Administrative Region. It is intended to notify clients of the reasons for personal data collection, how personal data will be used and to whom data access requests are to be addressed.

3. **Personal Data Requested, Collected and Held by BPI IFL**

BPI IFL may request, collect and hold personal data relating to clients and other individuals such as:

- applicants for banking or financial services;
- persons giving or proposing to give guarantees or security for obligations owed to BPI IFL;
- persons linked to a client or an applicant that is not an individual, including the beneficial owners and officers of that client or applicant, or in the case of a trust, including the trustees, settlors, protectors and beneficiaries of the trust; and
- other persons who are relevant to a client's relationship with BPI IFL.

If the data requested by BPI IFL is not provided, we may be unable to provide (or continue to provide) products or services to the relevant client or applicant linked to the client.

Data may be:

- collected from the client directly, from someone acting on behalf of the client or from another source; and
- combined with other data available to members of the entities within the Bank of the Philippine Islands ("BPI") corporate group ("BPI Group" and any "member of the BPI Group" means BPI and/or its affiliates, subsidiaries, associated entities and any of their branches and offices whether within or outside Hong Kong).

Such personal data may include:

a. name and address, occupation, contact details, date of birth and nationality of clients and marital status of clients and their identity card and/or passport numbers and place and date of issue thereof;
b. current employer, nature of position and annual salary of clients;
c. information obtained by BPI IFL in the ordinary course of the continuation of the business relationship (for example, when clients communicate verbally or in writing with the Company, by means of documentation or telephone recording system, as the case may be, and shall include investment portfolio information);

From time to time, BPI IFL may hold other kinds of personal data which it needs in the light of experience and the specific nature of its business.

4. **Purposes of Keeping Personal Data**

BPI IFL may use personal data for the following services:

(a) daily operation of services provided to clients including but not limited investment portfolio consolidation, review and analysis which may require discussion, co-ordination and corroboration within the BPI Group;
(b) conducting credit checks at the time of application for credit and at the time of regular or special reviews which normally will take place one or more times each year;
(c) creating and maintaining our credit rating models;
(d) assisting other financial institutions, credit or charge card issuing companies and debt collection agencies to conduct credit checks and collect debts;
(e) ensuring ongoing credit worthiness of clients;
(f) designing financial services or related products for clients' use;
(g) marketing services and products;
(h) determining the amounts of indebtedness owed to or by clients;
(i) collection of amounts outstanding from clients and those providing security for clients' obligations and the enforcement of obligations of clients and those providing security;
(j) complying with the obligations, requirements or arrangements for disclosing and using data that apply to BPI IFL or that it is expected to comply with according to:

(i) any law binding or applying to it within or outside the Hong Kong Special Administrative Region ("Hong Kong") existing currently and in the future;
(ii) any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside the Hong Kong existing currently and in the future;
(iii) any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers that is assumed by or imposed on BPI IFL by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, law enforcement or other authority, or self-regulatory or industry bodies or associations;
(iv) complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the BPI Group and/or any other use of 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;

(v) enabling an actual or proposed assignee of BPI IFL, or participant or sub-participant of BPI IFL's rights in respect of the client to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation;

(vi) any other purpose permitted by law; and

(vii) any other related purposes.

5. **Collection of Personal Data**

When clients visit BPI IFL's website, cookies will be stored in their device. "Cookies" are small-text files retrieved by the site, as part of BPI IFL's interaction with their browser. BPI IFL uses "cookies" to capture the information of web pages visited, session identifiers and language preferences while no personal information is captured in the cookies. The information gathered by cookies may be used for session management, storing user preferences and tracking of web traffic statistics in which web visitors have visited and are interested in. Most web browsers are initially set up to accept cookies. Clients can choose to "not accept" by changing the settings on their web browsers. If clients disable cookies in their web browsers, they may not be able to access some of the site functions. No personally identifiable information will be transferred to a third party.

6. **Security of Personal Data**

BPI IFL commits to protect the personal data by restricting access by authorized personnel on a need to know basis, providing secure data storage facilities and incorporating security measures into equipment in which data is held. Encryption technology is employed for sensitive data transmission. If BPI IFL engages data processors to handle or process personal data on our behalf (whether within or outside Hong Kong), we will adopt contractual or other means to prevent unauthorized or accidental access, processing, erasure, loss or use of the data transferred to the data processors for processing.

Such data may be transferred in and to a place outside Hong Kong.

7. **Retention of Personal Data**

The personal data provided by clients will not be kept longer than necessary for the fulfillment of the purposes for which the personal data are or are to be used at the time of the collection and for compliance with the legal, regulatory and accounting requirements from time to time.

8. **Disclosure of Personal Data**

Data held by BPI IFL or a member of the BPI Group will be kept confidential but we or a member of the BPI Group may provide data to the following parties or any of them (whether within or outside Hong Kong) for the purposes set out above (paragraph 4):

(a) any agents, contractors, sub-contractors or associates of the BPI Group (including their employees, officers, agents, contractors, service providers and professional advisers);

(b) any third-party service providers who provide services to BPI IFL or any member of the BPI Group in connection with the operation or maintenance of our business (including their employees and officers);
(c) any regulatory authorities;
(d) any persons under a duty of confidentiality to BPI IFL or a member of the BPI IFL Group which have undertaken to keep such data confidential;
(e) any persons acting on behalf of a client whose data are provided, payment recipients, beneficiaries, account nominees, intermediary, correspondent and agent banks, clearing houses, clearing or settlement systems, market counterparties, upstream withholding agents, swap or trade repositories, stock exchanges, companies in which clients have an interest in securities (where such securities are held by BPI IFL or any member of the BPI Group) or any persons making any payment into a client's account;
(f) credit reference agencies, and, in the event of default, to debt collection agencies;
(g) any persons to whom we are or any member of the BPI Group is under an obligation or required or expected to make disclosure for the purposes set out in, or in connection with, paragraph 4(j) above;
(h) any actual or proposed assignee(s) of ours or participant(s) or sub-participant(s) or transferee(s) of our rights in respect of the client;
(i) any persons giving or proposing to give a guarantee or security to guarantee or secure the client's obligations to BPI IFL; and
    (i) any member of the BPI Group;
    (ii) third party financial institutions, insurers, credit card companies, securities and investment services providers;
    (iii) third party reward, loyalty, co-branding and privileges programme providers;
    (iv) co-branding partners of ours or any member of the BPI Group (the names of such co-branding partners will be provided during the application process for the relevant products and services, as the case may be);
    (v) charitable or non-profit making organisations; and
(j) external service providers that we or any member of the BPI Group engage(s) for the purposes set out in paragraph 4(h) above.

9. **Revision of Privacy and Security Statement**

This Statement is subject to review and amendment from time to time.

10. **Data Access Requests and Data Correction Requests**

BPI IFL will comply with and process all data access and correction requests in accordance with the provisions of the Ordinance.

BPI IFL may impose a reasonable fee for complying with a data access request in accordance with the Ordinance.

Data access requests and data correction requests to BPI IFL may be addressed to our Data Protection Officer.

11. **Contact Details of Data Protection Officer**

Request for access to personal data or correction of personal data or for information regarding policies and practices on personal data and kinds of data held should be addressed to:

Title	Data Protection Officer
Address	5th Floor, LHT Tower, 31 Queen's Road Central, Hong Kong
Email	bpiifl.compliance@bpi.com.ph

Part B. Security Advice

1. Protect Your Account and Password

To protect your ePortal Account and Password, we recommend the following:

(a) Do not use your identity card number, telephone number, date of birth, driving license number, or any popular number sequence (such as 98765 or 12345) when choosing your PIN or password. Do not use the same digit more than twice. Use alphanumeric passwords that contain both characters and numbers, such as rks976ijk or 15ritca.

(b) Memorise your PIN and password. Do not write them down.

(c) Change your PIN and password regularly. Avoid reusing of passwords from personal accounts and/or social media accounts.

(d) Keep your user ID and password secret at all times. Ensure that you (and, where relevant, any authorised person) do not disclose or share this information with anyone – including any joint account holder or any financial management software or programs – under any circumstances, and do not transmit this information through email or any instant messaging software/programs. Never assign the same password for any other services (such as your internet connection, or login details for another website). In addition, choose login credentials, user ID, and/or passwords which are significantly distinct from your other personal accounts, especially from social media accounts.

(e) Under no circumstances will BPI IFL use an email, SMS, instant message, phone call, or any other method to ask for your personal information, such as your password, One-time Password ("OTP"), ID number, date of birth, account number, telephone number. Do not disclose this information to anyone, including any person who claims to be an employee or representative of BPI IFL, under any circumstances.

(f) Notify BPI IFL immediately of any actual or possible unauthorised use of your PIN or password, and send confirmation in writing to BPI IFL without delay. Change your password immediately if you suspect it has been revealed.

(g) Check your surroundings and make sure that no one sees your PIN or password. Cover the keypad when you enter your PIN on any device, such as a personal computer, mobile device, or other self-service terminal.

(h) Remember to log out of the system and close your browser whenever you leave your computer, even for a short while. Never leave your device unattended while using the ePortal or let any other person use your ePortal.

(i) Clear your browser's cache on a regular basis so that your account information is removed. This is particularly important if you are using a shared PC, in which case you should clear it after each session.

(j) Do not use a public computer or public Wi-Fi network to access your ePortal. Choose encrypted networks and remove any unnecessary Wi-Fi connection settings when using Wi-Fi to log in to the ePortal. Please disable any wireless network functions (e.g. Wi-Fi, Bluetooth, near-field communication (NFC)), or payment apps whenever such functions are unnecessary.

(k) Change your PIN or password immediately if you suspect that you have been deceived by a fraudulent website or email, or through a public Wi-Fi connection, public computer, third party's device, or any other means (for example, if you fail to log in to a service website after entering your correct PIN, whether or not any alert messages appear).

(l) Do not click on a URL to login into the site.

(m) If you receive any suspicious communications please alert us immediately at bpi_ifl@bpi.com.ph.

(n) Check your last log-in date and time whenever you log into the ePortal.

2. Protect Your Device

To protect your device, we recommend the following:

(a) Always use the latest recommended Internet browser that is equipped with up-to-date security features. Update your PC with latest anti-virus software, personal firewall and security updates for browsers.

(b) Take precautions against hackers, viruses, spyware, and any other malicious software when sending and receiving emails, opening email attachments, visiting and disclosing personal/financial information to unknown websites, and downloading files or programmes from websites. Do not browse suspicious websites or click on the hyperlinks and attachments in suspicious emails, including but not limited to encrypted files, compressed files (zip), or messages received through WhatsApp, Line, WeChat and other e-communities.

(c) Do not install or run apps from third-party sources on your device. You are recommended to set your device to block installation of apps from unknown sources and keep it properly configured.

(d) Check the storage, battery, and mobile data usage of apps in your mobile device from time to time to see if there are any suspicious apps. Uninstall any suspicious app when necessary.

(e) If your device is capable of biometric authentication (e.g. fingerprint or facial recognition), do not let any other person register his/her biometrics on it. Do not disable any features that can strengthen the security of biometric authentication, such as “attention awareness” for facial recognition (e.g. ensure that the “Require Attention for Face ID” setting is enabled).