

**BPI International Finance Limited  
Personal Information Collection 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 (Cap.486).

## **2. Notice Relating to the Personal Data (Privacy) Ordinance (the "Ordinance")**

This Notice is served by BPI IFL in accordance with the 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. Use of Personal Data**

BPI IFL may use personal data for the following services:

- (a) daily operation of services provided to clients including but not limited to 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.

## 7. Retention of Personal Data

The personal data provided by clients will not be kept longer than necessary for the fulfilment 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 your 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
  - (vi) external service providers that we or any member of the BPI Group engage(s) for the purposes set out in paragraph 4(g) above.

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

## 9. Use of Personal Data for Direct Marketing

BPI IFL intends to use your personal data in direct marketing and we require your consent (which includes an indication of no objection) for that purpose. Please note that:

- (a) your name, contact details, products and other service portfolio information, transaction pattern and behavior, financial background and demographic data held by us from time to time may be used by us in direct marketing;
- (b) the following classes of products, services and subjects may be marketed:
  - (i) financial, insurance, banking and related products and services;
  - (ii) reward, loyalty, co-branding or privileges programmes and related products and services;

- (iii) products and services offered by our co-branding partners (the names of such co-branding partners will be provided during the application for the relevant products and services, as the case may be); and
  - (iv) donations and contributions for charitable and/or non-profit making purposes.
- (c) the above products, services and subjects may be provided by or solicited by us and/or:
- (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 or 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 of the relevant products and services, as the case may be).
  - (v) charitable or non-profit making organizations.
- (d) we do not give your personal data to others for them to market their products and services to you and if we ever wanted to do this, we will get your separate consent; and
- (e) we may receive money or other property in return for marketing third party products. We will inform you if we will receive any money or other property in return for providing the data to the other persons.

**If you do not wish BPI IFL to use your personal data in direct marketing as described above, you may exercise your opt-out right by notifying BPI IFL.**

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

You have the right:

- (a) to check whether we hold personal data about you and to access such data;
- (b) to require us to correct any personal data relating to you which is inaccurate; and
- (c) to ascertain our policies and practices in relation to data and to be informed of the kind of personal data held by BPI IFL.

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	5 <sup>th</sup> Floor, LHT Tower, 31 Queen's Road Central, Hong Kong
Email	BPI-IFL-Compliance@bpi.com.hk