
法国兴业银行（中国）有限公司
个人信息及隐私政策

发布时间：2022年1月21日

生效时间：2022年2月07日

前言

法国兴业银行（中国）有限公司（“我行”或者“我们”）深知个人信息对您以及与您相关的人士（以下简称“相关人士”，具体范围见下文）的重要性，并会尽全力保护相关个人信息安全可靠。我们致力于维持您对我们的信任，恪守以下原则，保护相关个人信息：权责一致原则、目的明确原则、选择同意原则、最少必要原则、确保安全原则、主体参与原则、公开透明原则等。我们建议您仔细阅读本《个人信息及隐私政策》（以下简称“本政策”），并特别注意其中通过加粗和/或下划线标注的部分。

本政策是我行统一适用的一般性隐私条款，适用于您申请或使用我们的任何产品或服务，访问、浏览、使用我们的网上银行及其他在线服务，或者您与我们交易、合作，作为我们的供应商，以及通过任何方式与我们进行沟通、联络的过程中所涉及的您及相关人士的个人信息。我们还可能就特定产品、服务或活动涉及的个人信息处理事宜通过相应的产品（或服务）协议、授权书等方式明示，如相应的产品（或服务）协议、授权书等就个人信息处理另行约定的条款与条件和本政策不一致的，以另行约定为准。

本政策所称的“相关人士”是指与您相关联的任何自然人，包括但不限于公司董事、监事、高级管理人员、法定代表人、负责人、授权签字人、业务经办人或其他员工、股东、其他出资人、合伙组织的合伙人或合伙成员、实际控制人、受益所有人、指定账户持有人、指定收款人、或前述人士的代表及代理等。签署《个人信息及隐私政策》前，请您将本政策转达给相关人士，确保其知晓并充分理解本政策（特别是加粗和/或下划字体内容的含义）及相应法律后果，并获得其合法有效的授权或同意。您点击或勾选“同意”或以其他形式签署或接受本政策，即视为您及相关人士接受本政策，我行将按照相关法律法规及本政策来合法使用和保护个人信息。

您可以通过我行的微信公众号“法国兴业银行”或我行网址(https://sogonline.societegenerale.cn/eweb/zh_CN/sg/privacy.pdf)获取本政策，如您或相关人士有任何疑问、意见或建议，可先与您的客户经理联系，或通过以下联系方式与我们联系：

客服热线：400-8888-760

微信公众号：法国兴业银行

电子邮箱：CN-Privacy-Helpdesk@socgen.com.cn

本政策包括以下内容：

一、我行如何收集和使用个人信息

-
- 二、我行如何存储和保护个人信息
 - 三、我行如何委托处理、共享、转让、公开披露个人信息
 - 四、如何访问和管理您及相关人士的个人信息
 - 五、我行如何处理未成年人的个人信息
 - 六、本政策如何更新

一、我行如何收集和使用个人信息

（一）当您作为我们的客户

我们可能会出于本政策所述的以下目的，收集和使用您及相关人士在使用我们产品或服务过程中主动提供或因使用产品或服务而产生的个人信息，以及根据法律法规规定或者您及相关人士的授权同意合法向第三方收集的个人信息。如果我们需要额外收集个人信息，或将已经收集的个人信息用于其他目的，我们将以合理的方式进行告知并在收集前再次征得所需的授权同意。如您办理的业务涉及人脸信息等个人敏感信息的，我行将依照法律规定对相关个人敏感信息进行处理。

1. 提供核心业务产品和/或服务中您主动提供的个人信息

首先，为实现我行向您提供的产品或服务以及办理相应业务的核心功能，我行可能需要向您收集您及相关人士的个人信息。以下将详细列出我行的核心业务功能及为实现该功能所需收集的必要的个人信息，若您或相关人士拒绝，则无法使用相关产品、服务或办理相应业务。**提示您注意：如果您提供的是相关人士的个人信息，请确保您提供的个人信息来源合法，且已取得相关人士合法有效的授权同意。**

（1）“了解你的客户”流程

依照法律法规及监管要求，当您准备与我行建立业务合作关系前或者为客户持续识别的目的，为了履行反洗钱、尽职调查等合规义务，我行会通过“了解你的客户”流程收集相关人士的个人基本资料如姓名、出生日期、性别、民族、国籍、住址、婚姻状况(如需)、家庭关系(如需)、个人电话号码、电子邮件地址等，**个人身份识别信息如身份证、护照、工作证等，个人生物识别信息如签字样本、笔迹(如需)、肖像(如需)**等，个人教育工作信息如职业、职位、工作单位、教育经历、学历、学位等，以及**个人财产信息如年收入情况、征信系统信息、收入来源**等，若您或相关人士拒绝，将影响我们为您建立客户档案，且/或您可能无法使用我行服务或产品以及在我行办理业务。

（2）账户服务

依据法律法规及监管要求，当您在我行开立账户时，我行会收集法定代表人/单位负责人、业务经办人及授权签字人等相关人士的个人基本资料如姓名、出生日期、性别、民族、国籍、住址、联系方式等，**身份信息及职业信息如身份证明文件、职业、职位、工作单位等，个人生物识别信息如签字样本、笔迹、肖像(如需)**等。如果您或相关人士拒绝提供这些信息，您及相关人士可能无法成功办理开户业务。若您开通网上银行服务，当您或相关人士通过网上银行注册、登录或激活账号时，我行会收集**相关人士的姓名、电话号码、职业、职位、工作单位以及身份证明文件**

等身份信息，以及网上银行的用户名及验证信息等。前述信息主要用于验证相关人士的身份，如果您或相关人士拒绝提供这些信息，您及相关人士可能无法正常开通或使用网上银行功能。

(3) 存款服务

当您在我行办理结构性存款、定期存款等存款类服务时，我行会收集法定代表人/单位负责人、业务经办人及授权签字人等相关人士的个人基本资料如姓名、出生日期、性别、民族、国籍、住址、联系方式等，身份信息及职业信息如身份证明文件、职业、职位、工作单位等，个人生物识别信息如签字样本、笔迹等。

(4) 转账汇款服务

当您使用转账汇款功能时，我们需要收集收款人姓名、收款人银行卡号/账号、开户行等相关人士的账户信息，同时我行会收集和存储您及相关人士的相关交易记录包括交易金额、币种、时间、交易用途等信息，用以为您办理相应业务且便于您查询交易记录。

(5) 结售汇、外汇交易及兑换服务

您在我行办理结售汇、外汇交易和外币间兑换等业务时，我们需要收集相关人士如业务经办人、联系人的姓名、电话号码、电子邮件等个人基本资料及相关通信信息，及其身份证明文件、职业、职位、工作单位等身份信息及职业信息，个人生物识别信息如签字样本、笔迹等。

(6) 代客境外理财服务(QDII)

您在我行办理代客境外理财业务时，我行可能需要收集业务经办人、授权签字人等相关人士的个人基本资料如姓名、出生日期、性别、民族、国籍、住址、联系方式等，身份信息及职业信息如身份证明文件、职业、职位、工作单位等，您及相关人士与我行的通信信息等。同时我们会收集和存储您及相关人士的交易信息，包括交易账户、交易金额、交易币种、交易时间等。

(7) 衍生品交易服务

您在我行办理衍生品交易业务时，我行可能需要收集业务经办人、授权签字人等相关人士的个人基本资料如姓名、出生日期、性别、民族、国籍、住址、联系方式等，身份信息及职业信息如身份证明文件、职业、职位、工作单位等，个人生物识别信息如签字样本、笔迹等，以及您和相关人士与我行的通信信息等。同时我们会收集和存储您及相关人士的交易信息，包括交易账户、交易金额、交易币种、交易时间等。

(8) 贸易融资服务

当您通过我行办理贸易融资业务时，我行会收集法定代表人、授权签字人、业务经办人等相关人士的姓名、联系方式等个人基本资料、身份证明文件、职业、职位、工作单位等身份信息及职业信息，签字样本、笔迹等个人生物识别信息，您及相关人士与我行的通信信息等。涉及交易相对方的，我们会收集相应收款方/付款方姓名、银行账号、地址，及收款方/付款方授权签字人、业务经办人等相关人士的姓名、联系方式、身份证明文件、职业、职位、工作单位等身份信息及职业信息，以及签字样本、笔迹等个人生物识别信息。

(9) 信贷服务

当您向我行申请信贷产品时，我行会收集法定代表人、授权签字人、业务经办人等相关人士的个人基本资料及工作信息，个人身份识别信息如身份证、护照、工作证等，个人生物识别信息如签字样本、笔迹等。涉及担保人或类似性质人士的，我行会收集该等担保人的个人基本资料及工作信息，个人身份信息如身份证明文件、与您的关系（如任职关系、持股及投资关系）等，个人财产信息如个人收入状况、拥有资产状况、负债状况、投资情况、收入来源等，个人信用信息如信用卡、贷款及其他信贷交易信息、诉讼、调查、处罚信息以及其他能够反映个人信用状况的信息，以及个人生物识别信息如签字样本、笔迹、肖像等。上述信息系为了办理信贷业务所需，如您或相关人士拒绝提供这些信息，我们可能无法为您或相关人士提供信贷服务。

(10) 业务维护及沟通联络

为了维护客户关系以及业务的正常运行，我行会收集您及相关人士与我们的通信信息，以及联络人、业务经办人等相关人士的个人基本资料及工作信息。若您及相关人士在与我行的沟通、交互中自愿向我们提供其他个人信息，或允许我们向您或相关人士授权的第三方收集其他个人信息，我们会按照适用法律法规收集相应个人信息。拒绝提供前述个人信息可能导致您或相关人士无法使用、享受对应的服务功能或参加相关客户活动，但不影响您正常使用我们的其他产品或服务。

2. 提供产品和/或服务中我们主动收集和使用的个人信息

为了保障您的账户及交易安全，并维护系统的正常运行，我们会收集您及相关人士在使用我们产品或服务过程中产生的相关信息，用以判断您的账户风险以及保障我们为您提供服务、对我行系统问题进行分析、统计流量，并在您向我们发送异常信息时予以排查。这些信息包括：

(1) 日志信息

当您及相关人士使用我们提供的网上银行产品和/或服务时，我们会收集您及相关人士使用我们服务的详细情况，并作为网络日志进行保存，包括您及相关人士使用的语言、访问的时间，以及请求我行的网页记录、操作系统、软件信息、登录IP信息。

(2) 设备信息

当您及相关人士使用我们通过网上银行或其他在线渠道提供的产品和/或服务时，为了保障交易安全，我们可能获取您及相关人士的IP地址、设备MAC地址、操作系统类型及版本、浏览器版本等网络身份标识信息及设备信息。

请您理解，我们向您提供的功能和服务是不断更新和发展的，如果某一功能或服务未在前述说明中且将收集相关人士的信息，我们将以合理的方式进行告知并在收集前再次征得所需的授权同意。

(二) 当您作为我们的供应商

我们可能会出于以下所述目的，收集和使用您及相关人士主动向我们提供的个人信息，或基于与我行交易或合作产生的个人信息，以及根据法律法规规定或者您及相关人士的授权

同意合法向第三方收集的个人信息。如果我们需要额外收集个人信息，或将已经收集的个人信息用于其他目的，我们将以合理的方式进行告知并在收集前再次征得所需的授权同意。

1. 市场调研及供应商准入

为了解市场资源及服务供应商产品或方案，以及开展招投标、供应商背景调查等市场调研及供应商准入之目的，我们会收集法定代表人、授权签字人、业务经办人或其他员工等相关人士的个人基本资料如姓名、性别、联系方式等，身份证明文件、签字样本、教育工作信息如个人简历、职业、职位、工作单位、工作经历、专业资质、学历、学位、教育经历，与您的关系（如任职关系、持股及投资关系）等。

2. 供应商管理及沟通联络

为了推进与您之间的合作关系、订立或履行我们与您之间的协议或与您及相关人士进行沟通联系，我们会收集您及相关人士与我行的通信信息，以及联络人、经办人等相关人士的个人基本资料及工作信息等。若您及相关人士在与我行的沟通、交互中自愿向我们提供其他个人信息，或允许我们向您或相关人士授权的第三方收集其他个人信息，我们会按照适用法律法规收集相应个人信息。

3. 履行我行法定职责或义务

为了识别相关人士身份、履行我行法定职责或义务，我们会收集相关人士的姓名、性别、联系方式、身份证明文件、签字样本等信息。

若您或相关人士拒绝提供上述信息，将影响我行与您之间的交易或合作，我行可能无法与您建立（包括前期评估）或维持相应合作关系。

（三）征得授权同意的例外

根据相关法律、行政法规，在以下例外情形中，即使未获得相应授权同意，我行仍可能会收集并使用您及相关人士的个人信息：

1. 与我行履行法定职责或法定义务相关的；
2. 与国家安全、国防安全直接相关的；
3. 与公共安全、公共卫生、重大公共利益直接相关的；
4. 与刑事侦查、起诉、审判和判决执行等直接相关的；
5. 出于维护相关人士或其他个人的生命、财产等重大合法权益但又很难得到本人授权同意的；
6. 所涉及的个人信息是相关人士自行向社会公众公开的，且收集、使用信息不违反法律规定；
7. 为订立或履行相关人士作为一方当事人的合同所必需的；
8. 从合法公开披露的信息中收集个人信息的，如合法的新闻报道、政府信息公开等渠道；
9. 维护所提供产品或服务的安全稳定运行所必需的，如发现、处置产品或服务的故障。

二、我行如何存储和保护个人信息

（一）我行存储个人信息的情况

-
1. 我行在中华人民共和国境内收集和产生的个人信息，将存储在中华人民共和国境内。但为处理跨境等业务所需，您及相关人士的个人信息可能会被转移到境外。此种情况下，我行将按照法律法规和监管规定执行，并采取有效措施保护相关人士的个人信息的安全。
 2. 我行遵守中华人民共和国关于数据存储的法律、法规、规范要求。当我们收集或处理您及相关人士的个人信息时，我们将依据法律法规、监管规定、档案、会计、审计、报告要求以及本政策所述之目的、用途，将个人信息保存至满足信息收集目的、用途所需的最短保存时间。当超出保存期限后，我行会对您及相关人士的个人信息进行删除或匿名化处理，若删除个人信息从技术上难以实现的，我行会停止除存储和采取必要的安全保护措施之外的个人信息处理活动。但我们依据法律法规、监管规定、档案、会计、审计、报告要求，您或相关人士与我们之间的特别约定，或为了清理您或相关人士与我们之间的债权债务关系，向您、相关人士、监管机构及其他有关机关提供记录查询，而需要继续保留的信息除外。

（二）我行采取的保护个人信息的安全措施

1. 我行已使用符合业界标准的安全防护措施保护您及相关人士提供的个人信息，防止数据遭到未经授权的访问、复制、公开披露、使用、修改、传送、损坏或丢失。
2. 互联网环境并非百分之百安全，我们将尽力确保或担保您发送给我们的任何信息的安全性。同时在使用账户服务、网上银行等服务时，也请您及相关人士务必妥善保管好您及相关人士的账户登录名、身份信息及其他认证要素（包括密码等）。一旦泄漏了前述信息，您及相关人士可能会蒙受损失，并可能产生对您及相关人士不利的法律后果。如您及相关人士发现账户登录名及/或其他身份要素可能或已经泄露时，请您及相关人士立即和我行取得联系，以便我行及时采取相应措施以避免或降低相关损失。
3. 若不幸发生个人信息安全事件，我行将按照法律法规的要求及时采取有效补救措施，阻止安全事件扩大。我行将及时将事件相关情况告知您或相关人士，难以逐一告知时，我行会采取合理、有效的方式发布公告。同时，我行还将按照监管部门要求，主动上报个人信息安全事件的处置情况。

三、我行如何委托处理、共享、转让、公开披露个人信息

（一）委托处理及共享

1. 我行会委托服务提供商、专业顾问、承包商等来协助我们提供支持。对我们委托处理个人信息的第三方，我们会与其约定委托处理的目的、期限、处理方式、个人信息的种类、保护措施等相关内容，要求他们按照我们的要求、本政策以及其他相关的保密和安全措施来处理您及相关人士的个人信息。
2. 在必要且采取相应的保护措施的前提下，我们会将您及相关人士的个人信息共享给以下接收方：

（1）与法兴银行集团母公司及分支机构等关联方的共享：

您及相关人士的个人信息可能会在法兴银行集团内部之间进行共享。共享个人信息的范围将根据具体业务或合作情况而定。

（2）与合作方共享：

为了本政策规定之目的与用途，我行可能会与合作方共享您及相关人士的某些个人信息。我行仅会出于合法、正当、必要的目的共享个人信息，并且只会共享向您提供服务或与您开展合作所必要的个人信息。同时，我行会促使合作方按照适用的法律法规、本政策以及其他相关的保密和安全措施来处理您及相关人士的个人信息。如果您或相关人士拒绝我行与合作方共享为向您提供服务或与您开展合作所必须的个人信息，可能导致您或相关人士无法使用我行的相关服务，或我行无法与您进行交易、合作。

我行共享个人信息的合作方主要包括以下类型：

- a) 与我行进行业务合作的代理行、清算机构、金融产品发行方、资产管理人、中介经纪商等合作方；
 - b) 信用评级机构、征信机构（包括但不限于中国人民银行金融信用信息基础数据库）及身份验证服务商等；
 - c) 其他金融机构、行业协会、银行卡组织等合作伙伴。
- (3) 与您或相关人士授权的其他第三方共享：

我们可能会向您或相关人士授权的，或代表您或相关人士行事的第三方共享个人信息，该等第三方主要包括以下类型：

- a) 经您或相关人士授权或依法代表您或相关人士行事的第三方，如收款人、受益人、中介人、市场交易对手、上游预扣税代理人、掉期或交易登记机构、证券交易所、您拥有证券权益的公司（如该等证券由我行为您持有），或向您或相关人士作出任何付款的第三方；
- b) 就您接受的我的行的产品与服务、在我行办理业务或与我行进行交易，享有权利或负有义务，获得利益或承担风险的任何相关人士，例如我们会将您的贷款申请信息提供给为您在我行的债务提供或拟提供任何抵押或其他担保的相关人士，以便于我们为您提供信贷服务。

(4) 在法定情形下的共享：

我行可能会根据适用法律法规规定，或按照政府主管部门、监管机构、税务机关、法院等机构的强制性要求，对外共享您及相关人士的个人信息。

3. 当且仅当前述接收方涉及境外机构/人士时，该等提供会发生个人信息的跨境传输，包括传输至境外或受到来自于境外的访问。无论是在境内或境外处理个人信息，根据适用的法律法规，您及相关人士的个人信息将受到我行以及接收方均需遵守的保密及安全规范的保护。当适用的法律法规要求时，我们或前述接收方会应您及相关人士的要求另行告知个人信息共享的详情，包括个人信息接收方的姓名、联系方式、处理目的、处理方式和个人信息的种类（若涉及跨境个人信息传输，还包括向境外个人信息接收方行使有关权利的方式和程序等）。

（二）转让

我行不会将您及相关人士的个人信息转让给其他公司、组织和个人，但以下情况除外：

1. 征得所需的授权同意；
2. 根据法律法规或强制性的行政或司法要求；
3. 在合并、收购、业务/资产转让、重组、处置（包括资产证券化）、分立、解散、被宣告破产等类似情形中，如涉及到个人信息转让，我行会要求新的持有您及相关人士个人

信息的公司、组织继续受本政策的约束，否则我行将要求该公司、组织重新取得所需的授权同意。

（三）公开披露

我行仅会在以下情况，公开披露您及相关人士的个人信息：

1. 征得所需的授权同意；
2. 根据法律法规、法律程序、诉讼或政府主管部门的强制性要求，我行可能会公开披露您及相关人士的个人信息。

（四）征得授权同意的例外

以下情形中，我们可能会共享、转让、公开披露您及相关人士的个人信息，并且无需事先征得授权同意：

1. 与我行履行法定职责或法定义务相关的；
2. 与国家安全、国防安全直接相关的；
3. 与公共安全、公共卫生、重大公共利益直接相关的；
4. 与刑事侦查、起诉、审判和判决执行等直接相关的；
5. 出于维护相关人士或其他个人的生命、财产等重大合法权益但又很难得到本人授权同意的；
6. 相关人士自行向社会公众公开的个人信息，且共享、转让、公开披露信息不违反法律规定；
7. 从合法公开披露的信息中收集个人信息的，如合法的新闻报道、政府信息公开等渠道；
8. 为订立或履行相关人士作为一方当事人的合同所必需的。

四、如何访问和管理您及相关人士的个人信息

按照适用法律法规的要求，我行保障您及相关人士对其个人信息可以行使以下权利：

（一）访问个人信息

您及相关人士有权通过本政策披露的联系渠道访问您及相关人士的个人信息，适用法律法规另有规定的除外。若您作为我行客户，如果使用我行的网上银行服务，经您授权的网银操作人员可以通过网上银行访问其姓名、证件类型、证件号码、联系电话、邮箱。

（二）更正和更新个人信息

您及相关人士有权也有义务及时更新在我行的个人信息，以确保相关信息是准确和最新的。若您及相关人士发现我行对其个人信息处理有误时，有权要求我们做出更正。您及相关人士可以通过本政策披露的联系渠道提出更正申请。若您作为我行客户，如果使用我行的网上银行服务，经您授权的网银操作人员可以通过网上银行更正其姓名、证件类型、证件号码、联系电话、邮箱。

（三）删除个人信息

在以下情形中，我行将主动删除相关个人信息，或者您及相关人士可以通过本政策披露的联系渠道提出删除个人信息的请求，但法律法规、监管部门另有要求或删除个人信息从技术上难以实现的除外：

1. 处理目的已实现、无法实现或者为实现处理目的不再必要；

-
2. 我行停止提供产品、服务，或停止相关交易、合作，或者保存期限已届满（二者孰晚为准）；
 3. 您及相关人士撤回同意；
 4. 如果我行违反法律法规或约定处理个人信息。

（四）改变授权同意的范围

您及相关人士可以通过本政策披露的联系渠道改变个人信息授权同意的范围或撤回相关授权同意。当改变或撤回授权同意后，我们将不再处理相应的个人信息。但您或相关人士改变或撤回同意的决定，不会影响我们此前基于您或相关人士的授权已开展的个人信息处理活动。

（五）响应您及相关人士的上述请求

我们将在合理的期限内回复或响应您及相关人士的以上权利请求。为保障安全，相关人士可能需要通过您向我们提供书面请求及授权书，我行可能会先要求您验证相关人士的身份。**请理解，对于某些无端重复、需要过多技术手段、给他人合法权益带来风险，超出合理限度或者技术上非常不切实际的请求，我行可能会予以拒绝。在以下情形中，我们可能无法响应您及相关人士请求：**

1. 与我行履行法律法规、监管规定的义务相关的；
2. 与国家安全、国防安全直接相关的；
3. 与公共安全、公共卫生、重大公共利益直接相关的；
4. 与刑事侦查、起诉、审判和执行判决等直接相关的；
5. 我行有充分证据表明您或相关人士存在主观恶意或滥用权利的；
6. 出于维护相关人士或其他人的生命、财产等重大合法权益但又很难得到本人授权同意的；
7. 响应您或相关人士请求将导致您、相关人士或其他人、组织的合法权益受到严重损害的；
8. 涉及商业秘密的。

如我行决定不响应您及相关人士请求，会告知该决定的理由，并提供投诉的途径。

五、我行如何处理未成年人的个人信息

我行的对公产品、网站和服务主要面向企业、机构等，**未成年人不得使用我行的对公产品或服务，但为您办理的部分业务可能涉及到收集未成年人信息。请您确保向我行提供的相关未成年人的个人信息来源合法，且已获得其父母或监护人相应的授权同意。**我们将遵守法律法规、本政策规定以及《儿童个人信息网络保护规定》对未成年人的个人信息进行特别保护。如我行发现在对公业务中，未事先获得所需授权同意处理了未成年的个人数据，则会设法尽快删除相关数据。

六、本政策如何更新

根据国家法律法规变化及服务运营需要，我行将对本《个人信息及隐私政策》及相关规则不时地进行修改，修改后的内容会通过我行网银网址、微信公众号等渠道公布，并于文首所载之日生效，取代此前相关内容。请您不时关注相关公告、提示信息及协议、规则等相关内容的变动。对于重大变更，我行还会提供更为显著的通知（包括电子邮件等）。

本政策所指的重大变更包括但不限于：

1. 我们的服务模式，如处理个人信息的目的、处理个人信息的类型、个人信息的使用方式等发生重大变化；
2. 我们在所有权结构、组织架构等方面发生重大变化，如业务调整、破产并购等引起的所有者变更等；
3. 个人信息共享、转让或公开披露的主要对象类型发生变化；
4. 您及相关人士参与个人信息处理方面的权利及其行使方式发生重大变化；
5. 我们负责处理个人信息安全的责任部门、联络方式及投诉渠道发生变化；
6. 其他可能对您及相关人士的个人信息权益产生重大影响的变化。

您知悉并确认，如您继续使用我们的产品或服务，或继续与我行进行交易或合作，即视为您及相关人士同意接受更新内容，您已将更新内容告知相关人士且已获得所需的授权同意。

为了使您能及时接收通知，建议您在联系方式更新时及时通知我们。在相关人士发生变动时，建议您及时联系我行更新相关人士信息，并确保相关人士充分阅读并理解了本《个人信息及隐私政策》的内容。

您可提醒相关人士事先阅读本政策，也可以向该人士提供本政策的副本。

本政策以中英文书就，中英文本如有歧义，概以中文为准。

Societe Generale (China) Limited
Personal Information and Privacy Policy
Released on: 21st January 2022
Effective on: 7th February 2022

Preamble

Societe Generale (China) Limited (“we”, “us” or “our”) fully understands the significance of personal information to you and to persons associated with you (“Associated Persons”, as defined below) and will use our best efforts to keep relevant personal information secure. We are committed to maintaining your trust in us and will adhere to the following principles to protect relevant personal information: the principle of consistency of powers and responsibilities, the principle of clear purpose, the principle of informed consent, the principle of minimum necessity, the principle of ensuring security, the principle of data subject participation, and the principle of openness and transparency. **You are advised to carefully read this Personal Information and Privacy Policy (this “Policy”) and pay particular attention to the contents in bold and/or underlined.**

This Policy is our general provisions on privacy and **applicable to all personal information of you and your Associated Persons involved during your application for or use of any of our products or services, your access, browsing or use of our e-banking or other online services, your dealing or cooperation with us, your capacity as our vendor, or your communication or contact with us in any manner.** We may also expressly inform you of the personal information processing related to certain products, services or activities through corresponding product (or service) agreement, authorization letter or otherwise. **In case of any inconsistency between this Policy and the terms and conditions on processing of personal information as agreed in relevant product (or service) agreement, authorization letter or otherwise, the latter shall prevail.**

“Associated Person” used herein means any individual associated with you, including without limitation, company directors, supervisors, senior officers, legal representatives, person-in-charge, authorized signatories, business agents, or other employees, shareholders or other investors, partners or partnership members (in the case of a partnership), actual controllers, beneficial owners, designated account holders, designated payees or the representatives or agents of any of the foregoing. Before executing this Policy, please communicate this Policy to your Associated Persons, make sure that they are aware of and fully understand this Policy (in particular the contents in bold and/or underlined) and the corresponding legal consequences, and obtain their legal and valid authorization or consent. **If you click or tick “Agree” or execute or accept this Policy in other forms, you and your Associated Persons will be deemed as having accepted this Policy, and we will use and protect the personal information in compliance with relevant laws and regulations as well as this Policy.**

You may find this Policy via our WeChat official account “法国兴业银行” or our website (at https://sogonline.societegenerale.cn/eweb/zh_CN/sg/privacy.pdf). If you or your Associated Persons have any questions, comments or suggestions, please contact your client relationship manager first, or contact us via:

Customer service hotline: 400-8888-760
WeChat official account: 法国兴业银行
Email: CN-Privacy-Helpdesk@socgen.com.cn

Contents of this Policy:

- I. How we collect and use personal information
- II. How we retain and protect personal information
- III. How we entrust processing, share, transfer or disclose personal information
- IV. How to access and manage personal information of you and your Associated Persons
- V. How we process personal information of minors
- VI. How we update this Policy

I. How we collect and use personal information

(I) When you are our client

We may, for the purposes set forth below in this Policy, collect and use the personal information provided by you or your Associated Persons during or generated from your use of our products or services, and the personal information lawfully collected from third parties in accordance with laws and regulations or with the authorization or consent from you or your Associated Persons. If any additional personal information would be collected, or if any personal information collected would be used for additional purposes, we will inform you in a reasonable manner and obtain necessary authorization or consent before such collection or use. If any sensitive personal information such as facial features would be involved, we will process such sensitive personal information in compliance with laws.

1. Personal information provided by you in our provision of core business products and/or services

We may need to collect from you the personal information of you and your Associated Persons in order to fulfill the core functions of our products or services provided to you and to handle the corresponding business. Details of our core business functions and the necessary personal information to be collected for fulfilling such functions are set out below. If you or your Associated Persons refuse to provide relevant information, you may be unable to use relevant product, service or conduct the corresponding business. **Please note: If you provide any personal information of Associated Persons, please ensure that the personal information provided by you is from legitimate sources and that you have obtained the legal and valid consent from Associated Persons.**

(1) “Know Your Customer” procedures

As required by laws, regulations and regulatory requirements, to perform our anti-money laundering, due diligence and other compliance obligations, before your establishment of business relationship with us or for the purpose of on-going client identification, we will collect, through our “Know Your Customer” procedures, the basic personal information of your Associated Persons, such as the name, date of birth, gender, ethnicity, nationality, address, marital status (when necessary), family relationship (when necessary), personal

phone number, email address and etc.; **personal identity information, such as the ID card, passport, work permit and etc.; personal biological information, such as the specimen signature, handwriting (when necessary), facial features (when necessary) and etc.;** personal education and occupation information, such as the occupation, position, employer, educational background, diploma, academic degree and etc.; and **personal property information, such as the annual income, records in credit reference system, sources of income** and etc. If you or your Associated Persons refuse to provide relevant information, we may be unable to create a client profile for you, and/or you may be unable to use our services or products or conduct corresponding business.

(2) Account services

As required by laws, regulations and regulatory requirements, when you open an account with us, we will collect the basic personal information of your legal representative/person-in-charge, business agent, authorized signatory and other Associated Persons, such as the name, date of birth, gender, ethnicity, nationality, address, contact information and etc.; **identity and occupation information such as the identity certificate, occupation, position, employer and etc.; and personal biological information such as the specimen signature, handwriting, facial features (when necessary) and etc.** If you or your Associated Persons refuse to provide such information, you and your Associated Persons may be unable to open the account.

If you intend to activate the e-banking services, when you or your Associated Persons register, log in with or activate an e-banking account, we will collect **the name, telephone number, occupation, position, employer, identity certificate and other identity information of your Associated Persons as well as the user name and verification information in the e-banking system.** Such information is mainly used to verify the identity of your Associated Persons. If you or your Associated Persons refuse to provide such information, you and your Associated Persons may be unable to activate or use the e-banking services.

(3) Deposit services

When you use our structured deposit, term deposit and other deposit services, we will collect the basic personal information of your legal representative/person-in-charge, business agent, authorized signatory and other Associated Persons, such as the name, date of birth, gender, ethnicity, nationality, address, contact information and etc.; **identity and occupation information, such as the identity certificate, occupation, position, employer and etc.; and personal biological information, such as the specimen signature, handwriting and etc.**

(4) Fund transfer and remittance services

When you use our fund transfer and remittance services, we will collect **the beneficiary's name, card number/account number, account open bank and other account information of Associated Persons,** and will collect and store **the relevant transaction records of you and your Associated Persons, including the transaction amount, currency, date/time, purpose and other information of such transactions,** so as to conduct relevant transactions for you and make such transaction records available for your inquiry.

-
- (5) Foreign exchange settlement/sale, transaction and conversion services
When you use our foreign exchange settlement/sale, transaction and conversion services, we will collect the name, phone number, email address and other basic personal information and relevant communication information of your business agent, contact person and other Associated Persons, **their identity certificate, occupation, position, employer and other identity and occupation information, as well as personal biological information such as the specimen signature, handwriting and etc.**
- (6) Overseas wealth management services for client fund (QDII)
When you use our overseas wealth management for client fund services, we may collect the basic personal information of your business agent, authorized signatory and other Associated Persons, such as the name, date of birth, gender, ethnicity, nationality, address, contact information and etc.; **the identity and occupation information, such as the identity certificate, occupation, position, employer and etc.; and communication information between you and your Associated Persons with us.** In addition, we will collect and store the **transaction information of you and your Associated Persons, including the account, amount, currency, date/time of each transaction and etc.**
- (7) Derivatives transaction services
When you use our derivatives transaction services, we may collect the basic personal information of your business agent, authorized signatory and other Associated Persons, such as the name, date of birth, gender, ethnicity, nationality, address, contact information and etc.; **identity and occupation information, such as the identity certificate, occupation, position and employer; their personal biological information, such as their specimen signature, handwriting and etc.; and communication information between you and your Associated Persons with us.** In addition, we will collect and store the **transaction information of you and your Associated Persons, including but not limited to the account, amount, currency, and date/time of each transaction and etc.**
- (8) Trade financing services
When you use our trade financing services, we will collect the name, contact information and other basic personal information of your legal representative, authorized signatory, business agent and other Associated Persons; **the identity certificate, occupation, position, employer and other identity and occupation information; the specimen signature, handwriting, and other personal biological information; and communication information between you and your Associated Persons with us.** In case of any counterparty involved, we will collect **the name, bank account number and address of the counterparty, as well as the name, contact information, identity certificate, occupation, position, employer and other identity and occupation information, the specimen signature, handwriting and other personal biological information of the authorized signatory, business agent and other Associated Persons of the counterparty.**
- (9) Credit services
When you apply for a credit product from us, we will collect the basic personal information and occupation information of your legal representative, business agent, authorized signatory and other Associated Persons; **their personally identifiable information, such as**

the ID card, passport, work card and etc.; and personal biological information, such as the specimen signature, handwriting and etc. In case of any guarantors or other persons in similar capacity are involved, we will collect their basic personal information and occupation information; **personal identity information such as the identity certificates and relationship with you (such as an employee, a shareholder or an investor); personal property information such as the income, assets, liabilities, investments, sources of income and etc.; personal credit information such as credit card, loan and other credit transaction information, litigation, investigation and penalty information, and other information that may reflect the personal credit status; and personal biological information such as the specimen signature, handwriting, facial features and etc.** Such information is necessary for the application of credit services. If you or your Associated Persons refuse to provide such information, we may be unable to provide the credit services to you or your Associated Persons.

(10) Business maintenance and communication

In order to maintain our client relationship and the normal operation of business, we will collect **the communication information between you and your Associated Persons with us**, as well as the basic personal information and occupation information of your contact person, business agent and other Associated Persons. If, during the communications and interactions between you or your Associated Persons with us, you or your Associated Persons provide us with, or allow us to collect from third parties authorized by you or your Associated Persons, any additional personal information, we will collect such personal information in compliance with applicable laws and regulations. Refusal to provide such personal information may result in the failure of you or your Associated Persons to use the corresponding services or participate in the relevant client activities, while your normal use of our other products or services will not be affected.

2. Personal information collected and used by us in our provision of products and/or services

In order to ensure the security of your account and transactions, and to maintain the normal operation of our system, we will collect the information generated during the use of our products or services by you or your Associated Persons, so as to determine the risks of your account, ensure our normal provision of services to you, analyze our system problems, obtain our system flow statistics, and conduct troubleshooting when you send us any abnormal information. Information collected by us includes:

(1) Log information

During the use of our e-banking products and/or services by you or your Associated Persons, we will collect details about such use and save them as network logs, **including the language used, the date and time of the visits, the webpages visited, system information, software information and login IP information.**

(2) Device information

To ensure the security of transactions, during the use by you or your Associated Persons of the products and/or services provided by us through e-banking or other online channels, we may obtain **the IP address, device MAC address, operating system type and version,**

and other network identity information and device information of you or your Associated Persons.

Please understand, the functions and services we provide to you are constantly evolving, and that if the personal information of Associated Persons will be collected by any function or service not mentioned above, we will inform you of such collection in a reasonable manner and obtain necessary authorization or consent again.

(II) When you are our vendor

We may, for the purposes set forth below, collect and use the personal information provided by you or your Associated Persons, or generated from your transactions or cooperation with us, and the personal information lawfully collected from third parties in accordance with laws and regulations or with the authorization or consent from you or your Associated Persons. If any additional personal information would be collected, or if any personal information collected would be used for additional purposes, we will inform you in a reasonable manner and obtain necessary authorization or consent before such collection or use.

1. Market investigation and vendor onboarding

In order to understand the market resources, and products or solutions provided by the service vendors, as well as to carry out bidding, vendor background checking and other market investigation, and vendor onboarding activities, we will collect the basic personal information of your legal representatives, authorized signatories, business agents and other Associated Persons, such as the name, gender and contact information, **the identity certificate and specimen signature**, education and occupation information, such as the personal resume, occupation, position, employer, work experience, professional qualification, diploma, academic degree and educational background, and **their relationship with you (such as an employee, a shareholder or an investor)**.

2. Vendor management and communication

In order to promote the cooperation with you, to enter into or perform the agreement between us, or to communicate with you and your Associated Persons, we will collect **the communication information between you and your Associated Persons with us**, as well as the basic personal information and occupation information of Associated Persons such as your contact persons and business agents. If you and your Associated Persons, provide us with additional personal information during the communications or interactions with us, or allow us to collect additional personal information from third parties authorized by you or your Associated Persons, we will collect such personal information in compliance with applicable laws and regulations.

3. Performance of our statutory duties or obligations

In order to identify the Associated Persons or perform our statutory duties or obligations, we may collect personal information such as the name, gender, contact information, **identity certificate, specimen signature and etc.** of Associated Persons.

If you or your Associated Persons refuse to provide relevant information, it may affect your transactions or cooperation with us, and we may be unable to establish (including pre-assessment) or maintain the corresponding cooperative relationship with you.

(III) Exceptions to obtaining consent

In accordance with the relevant laws and administrative regulations, **we may collect and use the personal information of you and your Associated Persons without consent under the following circumstances:**

1. in connection with the performance of statutory duties or obligations by us;
2. directly related to national security or national defense security;
3. directly related to public security, public health or significant public interests;
4. directly related to criminal investigation, prosecution, trial or judicial enforcement;
5. necessary for protecting the life, property or other major lawful rights and interests of any Associated Person or other individuals, where it is difficult to obtain the consent of data subjects;
6. such personal information are disclosed voluntarily by any Associated Person to the public, and the collection and use of the same do not violate any law;
7. necessary for entering into or performing a contract to which an Associated Person is a party;
8. the personal information is collected from legally and publicly disclosed information, such as lawful news reports or information disclosure by governments, etc.; or
9. necessary for maintaining the safe and stable operation of products or services, such as for identifying and handling defects in products or failure of services.

II. How we retain and protect personal information

(I) How we retain the personal information

1. The personal information we collect and generate in the People's Republic of China will be stored in the territory of People's Republic of China. However, the personal information of you or your Associated Persons may be transmitted outside the People's Republic of China for the purpose of processing cross-border business or otherwise, in which case we will comply with the relevant laws, regulations and regulatory requirements and take effective measures to protect such personal information.

2. We will comply with the laws, regulations and standards of the People's Republic of China in respect of data retention. Whenever we collect or process the personal information of you or your Associated Persons, we will only retain it for as long as necessary for the purpose and use for which it is collected in accordance with laws, regulations and regulatory requirements, filing, accounting, auditing and reporting requirements, and purposes and uses specified herein. Upon expiration of the retention period, we will delete or anonymize the personal information of you or your Associated Persons, and if it is technically difficult to do so, we will cease our processing other than storing and taking necessary security measures, except for any personal information to be retained for the purpose of making available to you, Associated Persons, regulatory authorities or other competent authorities upon request in accordance with laws, regulations and regulatory requirements, filing, accounting, auditing and reporting requirements, and any

specific agreement between you or the relevant Associated Person and us, or as necessary for clearing up any liability between you or the relevant Associated Person and us.

(II) Security measures we adopt to protect personal information

1. We have adopted security measures in compliance with the industry standards to protect the personal information provided by you or Associated Persons against unauthorized access, copy, public disclosure, use, modification, transmission, damage or loss.

2. The network environment is not 100% secure. Although we will endeavor to ensure or warrant the security of any information you send to us, you and Associated Persons are advised to properly keep the account login name, identity information and other authentication elements (including passwords, etc.) during the use of account services, e-banking services or otherwise. You and Associated Persons may suffer from losses and adverse legal consequences in the case of leakage of such information. If you or any Associated Person become aware that the account login name and/or other identity elements might be or have been leaked, please contact us immediately so that we may take corresponding measures in a timely manner to avoid or mitigate the relevant losses.

3. In the case of any unfortunate personal information security incident, we will take timely and effective remedial measures as required by laws and regulations to prevent its escalation, and notify you or the relevant Associated Person of such incident in a timely manner, or if it is difficult to notify you or the relevant Associated Person in person, publish an announcement in a reasonable and effective manner. In addition, we will also take the initiative to report our disposal of such incident in accordance with the requirements of regulatory authorities.

III. How we entrust processing, share, transfer or disclose personal information

(I) Entrust processing and sharing of personal information

1. We may entrust service providers, professional consultants or contractors, etc. to assist us in providing support. In respect of the third parties entrusted by us, we will agree with them on the processing purposes, period, methods, types of personal information, security measures and other relevant issues, and request them to process the personal information of you and Associated Persons in accordance with our requirements, this Policy and other related confidentiality and security measures.

2. If necessary and subject to corresponding protective measures, we will share the personal information of you and Associated Persons to the following recipients:

(1) Sharing with our affiliates, including the Societe Generale Group and branches:

The personal information of you and your Associated Persons may be shared within the Societe Generale Group. The scope of such sharing will depend on the specific business or cooperation.

(2) Sharing with our business partners:

We may share certain personal information of you and Associated Persons with our business partners for the purposes specified herein. We will only share such personal information for lawful, legitimate and necessary purposes to the extent required for providing services to or cooperating with you. In addition, we will procure our business

partners to process the personal information of you and Associated Persons in accordance with applicable laws and regulations, this Policy and other related confidentiality and security measures. You or Associated Persons may be unable to use our services, or we may be unable to conduct transactions or cooperate with you, if you or Associated Persons refuse our sharing of any personal information with our business partners that is necessary for providing services to or cooperating with you.

The types of business partners with whom we might share personal information mainly include:

- d) **correspondent banks, clearing institutions, financial product issuers, asset managers, brokers and other business partners cooperating with us;**
- e) **credit rating agencies, credit agencies (including but not limited to the Financial Credit Info Basic Database of the People's Bank of China) and other identity verification service providers; and**
- f) **other financial institutions, industry associations and bank card associations cooperating with us.**

(3) **Sharing with any third party authorized by you or Associated Persons:**

We may share personal information with third parties authorized by, or acting on behalf of, you or Associated Persons, and such third parties include, among others, the following types:

- c) **third parties authorized by or acting on behalf of you or Associated Persons, such as payees, beneficiaries, intermediaries, counterparties, withholding agents, swap or transaction registration agencies, stock exchanges, and companies whose securities are held by you (if such securities are held by us for you), and third parties making any payment to you or Associated Persons; and**
- d) **any related parties who have any right, obligation, benefit or risk with respect to your use of our products and services, business conducted with us or transactions with us. For example, we will provide your loan application information to any related parties who provide or intend to provide any mortgage or other security for your liabilities owed to us so that we will provide credit facility to you.**

(4) **Sharing as required by laws:**

We may share the personal information of you and Associated Persons with third parties in accordance with laws, regulations or mandatory requirements of competent authorities, such as government authorities, regulators, tax authorities and courts.

3. When and only when the recipient is an offshore entity/individual, will the personal information be transmitted to a jurisdiction outside the People's Republic of China, including transmission to or access by offshore entities/individuals. The personal information would be protected by confidentiality and security measures of us and of the recipients in accordance with applicable laws and regulations. If so required by applicable laws and regulations, upon request by you and Associated Persons, we or the recipient will separately inform you of details of such personal information sharing, including the name and contact information of the recipient, purposes and methods of processing, and types of personal information (and methods and procedures to exercise the relevant rights against the recipient in the case of sharing personal information to a jurisdiction outside the People's Republic of China).

(II) Transfer

We will not transfer any personal information of you and Associated Persons to any other company, organization or individual, **unless**:

1. we have obtained the necessary authorization or consent;
2. it is required by laws and regulations, or mandatory administrative or judicial requirements; or
3. such transfer occurs due to any merger, acquisition, business/asset transfer, restructuring, disposal (including asset securitization), division, dissolution, declared bankruptcy or other similar circumstances, and in such case, **we will request the new company or organization in possession of the personal information of you and Associated Persons to continue to be bound by this Policy; otherwise, we will request such company or organization to obtain necessary authorization or consent again.**

(III) Public disclosure

We will disclose the personal information of you and Associated Persons to the public only when:

1. we have obtained the necessary authorization or consent; or
2. such disclosure is required by laws and regulations, legal proceedings, litigation or mandatory requirements of competent governmental authorities.

(IV) Exceptions to obtaining consent

The personal information of you and Associated Persons may be shared, transferred or disclosed to the public by us without prior authorization and consent under the following circumstances:

1. in connection with the performance of statutory duties or obligations by us;
2. directly related to national security or national defense security;
3. directly related to public security, public health or significant public interests;
4. directly related to criminal investigation, prosecution, trial or judicial enforcement;
5. necessary for protecting the life, property or other major lawful rights and interests of any Associated Person or other individuals, where it is difficult to obtain the consent of data subjects;
6. such personal information are disclosed voluntarily by any Associated Person to the public, and the sharing, transfer or disclosure of the same does not violate any law;
7. such personal information are collected from legally and publicly disclosed information, such as lawful news reports or information disclosure by government, etc.; or
8. necessary for entering into or performing a contract to which an Associated Person is a party.

IV. How to access and manage personal information of you and Associated Persons

In accordance with applicable laws and regulations, we guarantee that you and Associated Persons may exercise the following rights in connection with the personal information of you and Associated Persons:

(I) Access personal information

Except as otherwise provided by applicable laws and regulations, you and Associated Persons have the right to access the personal information of you and Associated Persons through

channels specified herein. If you are our client and use our e-banking services, your authorized e-banking operator may access the name, type of identity certificate, identity certificate number, telephone number and email address in the e-banking system.

(II) Correct and update personal information

You and Associated Persons have the right and obligation to update the personal information of you and Associated Persons in a timely manner to ensure that such personal information are accurate and up-to-date. In the event that you or Associated Persons become aware of any error in any personal information processed by us, you or Associated Persons have the right to request us to make correction. Such request could be made through channels specified herein. If you are our client and use our e-banking services, your authorized e-banking operator may correct the name, type of identity certificate, identity certificate number, telephone number and email address in the e-banking system.

(III) Delete personal information

Unless otherwise required by laws, regulations or regulatory authorities, or the deletion of personal information is technically difficult, we will delete relevant personal information, or you and Associated Persons may request us to do so through channels specified herein, if:

1. the purpose of the personal information processing has been or is impossible to be realized, or such personal information are no longer necessary for such purpose;
2. we have ceased to provide the relevant products or services or to carry out relevant transaction or cooperation, or the retention period has expired (whichever is later);
3. the consent has been withdrawn by you and Associated Persons; or
4. our personal information processing is in violation of laws, regulations or the agreement.

(IV) Change the scope of consent

You and Associated Persons may change the scope of or withdraw consent in connection with the personal information of you and Associated Persons through channels specified herein, upon which we will no longer process the relevant personal information; However, any change or withdrawal of consent by you and Associated Persons would not affect the previous processing activities have been conducted by us based on the consent of you and Associated Persons.

(V) Respond to requests made by you and Associated Persons

We will reply or respond to the requests made by you and Associated Persons within a reasonable period. For the purpose of security, the Associated Persons may be required to submit a written request and authorization letter through you, and you may be required by us to verify the identity of such Associated Persons. **Please understand that we may refuse certain requests that are submitted repeatedly in an unreasonable manner, in need of excessive technical means, or at the risk of others' legitimate rights and interests, beyond the reasonable extent or technically impractical. In addition, we may be unable to respond to requests from you or Associated Persons under the following circumstances:**

1. in connection with the performance of statutory duties or obligations by us;
2. directly related to national security or national defense security;
3. directly related to public security, public health or significant public interests;
4. directly related to criminal investigation, prosecution, trial or judicial enforcement;
5. there is sufficient evidence to prove that you or Associated Persons have malicious intentions or abuse the rights;

-
6. necessary for protecting the life, property or other major lawful rights and interests of Associated Persons or other individuals, where it is difficult to obtain the consent of data subjects;
 7. response to the request from you or relevant Associated Person will cause material damage to the legal rights and interests of you, Associated Persons or other individuals or organizations;
 8. trade secrets are involved.

If we decide not to respond to requests from you or Associated Persons, we will notify you of the reasons and provide the channel for filing a complaint.

V. How we process personal information of minors

Our products, websites and services for corporate clients are mainly targeted at enterprises, institutions, and etc., **and minors are not allowed to use such corporate products or services. However, personal information of a minor may be collected in your use of certain services. Please ensure that any personal information of a minor provided to us is from legitimate source and that you have obtained the corresponding authorization or consent from his/her parent or guardian.** We will provide special protection for personal information of minors in accordance with laws and regulations, this Policy and the Provisions on the Cyber Protection of Personal information of Minors. If it is found that the personal information of a minor has been processed in any business for corporate clients without the necessary authorization or consent, we will endeavor to delete the relevant personal information as soon as possible.

VI. How we update this Policy

We will amend this Policy and the related rules from time to time in line with the changes of laws and regulations and needs of our service operation. The amendments will be published through our e-banking website, WeChat official account or other channels, and take effect and supersede all prior versions on the date specified therein. Please stay informed on relevant announcements, notices, agreements and rules from time to time. For material changes, we will provide notifications in a more prominent manner (including notifications by email, etc.).

“Material changes” referred to herein include but not limited to:

1. material change of our service modes, such as the purpose of personal information processing, the types of personal information we process and the manner we use personal information;
2. material change of our ownership structure, organizational structure or other aspects, such as change of ownership due to business adjustment, bankruptcy or merger and acquisition, etc.;
3. change of the main parties with or to whom the personal information are shared, transferred or disclosed;
4. material change of your rights or Associated Persons’ rights to participate in personal information processing or the way of exercise thereof;
5. change of our department responsible for the security of personal information processing, its contact manner or complaint channels; and
6. other changes that may have a significant impact on the rights and interests of you and Associated Persons in and to the personal information.

You are acknowledge and confirm that if you continue to use our products or services, or continue to conduct transaction or cooperate with us, you will be deemed as having informed

your Associated Persons of the updates and obtained their necessary authorization and consent, and both you and your Associated Persons will be deemed as having accepted the updates of this Policy.

You are advised to promptly inform us of any change in your contact details in order for you to receive our notifications in a timely manner. In case of any change of the Associated Persons, you are advised to contact us promptly to update the personal information of Associated Persons and to ensure that the relevant Associated Persons have fully read and understood this Personal Information and Privacy Policy.

You may either remind your Associated Persons to read this Policy in advance or provide a copy hereof to them.

This Policy is made in both Chinese and English, and the Chinese version shall prevail in case of any discrepancy between the English and Chinese versions.