

Notice to customers relating to the Personal Data (Privacy) Ordinance (the “Ordinance”)

HSBC Life (International) Limited (“HSBC”)

- (a)** From time to time, it is necessary for customers to supply HSBC with data in connection with the provision, continuation and administration of insurance contracts or other financial products and services by HSBC.
- (b)** Failure by a customer to supply such data may result in HSBC being unable to provide or continue to provide products and services to that customer.
- (c)** It is also the case that data are collected from customers in the course of the continuation of the customer or insurance relationship.
- (d)** The purposes for which data relating to a customer may be used are as follows:
- (i) offering, providing, maintaining and managing products and/or services to customers and the daily operation and administration of the products and/or services provided to customers which may include, without limitation, insurance, provident fund or scheme, credit facilities or other financial products or services;
 - (ii) conducting identity, medical and/or credit checks;
 - (iii) creating and maintaining the credit and risk related models of HSBC and the HSBC Group;
 - (iv) processing, assessing and determining any application or request made by a customer for products or services, issuing or arranging insurance contracts or other facilities and maintaining the customer’s account with HSBC;
 - (v) any purposes in connection with any claims made by or against or otherwise involving a customer in respect of any products and/or services provided by HSBC or HSBC Group companies including, without limitation, making, defending, analyzing, investigating, processing, assessing, determining responding to, resolving or settling such claims;
 - (vi) designing insurance and other financial products and/or services for customers’ use;
 - (vii) marketing services, products and other subjects as described in paragraph (f) below;
 - (viii) determining the amount of indebtedness owed to or by a customer;
 - (ix) collection of amounts outstanding from a customer and those providing security for customers’ obligations;
 - (x) exercising any rights HSBC and/or HSBC Group companies may have in connection with the products and/or services provided to a customer;
 - (xi) matching any data held by HSBC or HSBC Group companies relating to a customer from time to time for any of the purposes listed in this paragraph (d),
 - (xii) meeting the requirements to make disclosure under the requirements of any law binding on HSBC or any of its branches, any of the HSBC Group companies or any third party to whom HSBC provides customer data pursuant to paragraph (e) below (e.g. the Inland Revenue Ordinance and its provisions including those concerning automatic exchange of financial account information) or under and for the purposes of any regulations, guidelines or codes of practice issued by regulatory or other authorities or industry bodies, federations or associations with which HSBC or any of its branches, any of the HSBC Group companies or any third party to whom HSBC provides customer data pursuant to paragraph (e) below are expected to comply (e.g. regulations, guidelines or codes of practice issued by the Inland Revenue Department including those concerning automatic exchange of financial account information);
 - (xiii) complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the HSBC 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;
 - (xiv) enabling an actual or proposed assignee or transferee of HSBC or any of the HSBC Group companies, or participant or sub-participant of HSBC’s or any of the HSBC Group companies’ rights to evaluate and/or undertake due diligence in relation to the transaction intended to be the subject of the assignment, transfer, participation or sub-participation; and
 - (xv) purposes relating thereto.

(e) Data held by HSBC relating to a customer will be kept confidential but HSBC may provide such information to the following parties (whether within or outside the Hong Kong Special Administrative Region ("Hong Kong SAR")) for the purposes set out in paragraph (d):

- (i) any agent, contractor or third party service provider who provides services to HSBC or any HSBC Group companies in connection with the operation of its businesses including but not limited to administrative, telecommunications, computer, payment, telemarketing, call centre, data processing and storage services;
- (ii) any other person in the context of the sale by HSBC or any HSBC Group companies of all or part of its business or portfolio of products, policies or other assets or any proposed or confirmed transaction relating to such a sale provided that such person is under a duty of confidentiality to HSBC or to any of the HSBC Group companies which has undertaken to keep such information confidential;
- (iii) credit reference agencies or, in the event of default, any debt collection agencies;
- (iv) reinsurers for the purposes of underwriting, administration or evaluation of an insurance policy or product, or any purposes in connection with any claims pursuant to an insurance policy or product;
- (v) any person to whom HSBC or any of the HSBC Group companies is under an obligation to make disclosure under the requirements of any law binding on HSBC or any of its branches or any of the HSBC Group companies or under and for the purposes of any regulations, codes of practice or guidelines issued by regulatory or other authorities or industry bodies, federations or associations with which HSBC or any of its branches or any of the HSBC Group companies are expected to comply;
- (vi) any actual or proposed assignee or transferee of HSBC or any of the HSBC Group companies or participant or sub-participant of HSBC's or any of the HSBC Group companies' rights in respect of the customer; and
- (vii) HSBC Group companies;
- (viii) third party financial institutions, insurers, banks, securities and investment services providers and industry bodies, federations and associations;
- (ix) hospitals, clinics, medical practitioners, laboratories, technicians, loss adjustors, risk intelligence providers, legal advisers or private investigators that may be engaged by HSBC or on behalf of HSBC.

Such information may be transferred to a place outside Hong Kong SAR.

(f) Use of Data in Direct Marketing

HSBC intends to use customer data in direct marketing and HSBC requires the customer's consent (which includes an indication of no objection) for that purpose. In this connection, please note that:

- (i) the name, contact details, products and other service portfolio information, transaction pattern and behaviour, financial background and demographic data of a customer held by HSBC from time to time may be used by HSBC in direct marketing;
- (ii) the following classes of services, products and subjects may be marketed:
 - (1) financial, insurance, credit card, pensions, banking and related services and products;
 - (2) reward, loyalty, privilege or co-branding programmes and related services and products; and
 - (3) services and products offered by HSBC's co-branding partners (the names of such co-branding partners will be provided during the application of the relevant services and products, as the case may be); and
 - (4) donations and contributions for charitable and/or non-profit making purposes;
- (iii) the above services, products and subjects may be provided by or (in the case of donations and contributions) solicited by HSBC and/or:
 - (1) HSBC Group companies;
 - (2) third party financial institutions, insurers, banks, credit card companies, securities and investment services providers;
 - (3) third party reward, loyalty, privileges or co-branding programme providers;
 - (4) co-branding partners of HSBC and HSBC Group companies (where the names of such co-branding partners will be provided during the application process of the relevant services and products, as the case may be); and
 - (5) charitable or non-profit making organizations;

(iv) in addition to marketing the above services, products and subjects itself, HSBC also intends that from time to time it may provide the data described in paragraph (f)(i) above to all or any of the persons described in paragraph (f)(iii)(1) above for use by them in marketing those services, products and subjects, and HSBC requires the customer's written consent (which includes an indication of no objection) for that purpose.

If a customer does not wish HSBC to use or provide to other HSBC Group companies his/her data for use in direct marketing as described above, the customer may exercise his/her opt-out right by notifying HSBC.

(g) Under and in accordance with the terms of the Ordinance and the Code of Practice on Consumer Credit Data approved and issued under the Ordinance, any individual has the right:

- (i) to check whether HSBC holds data about him/her and of access to such data;
- (ii) to require HSBC to correct any data relating to him/her which is inaccurate;
- (iii) to ascertain HSBC's policies and practices in relation to data and to be informed of the kind of personal data held by HSBC; and
- (iv) in relation to consumer credit, to request to be informed whether any or which items of data are routinely disclosed to credit reference agencies or debt collection agencies, and be provided with further information to enable the making of an access and correction request to the relevant credit reference agency or debt collection agency.

(h) In accordance with the terms of the Ordinance, HSBC has the right to charge a reasonable fee for the processing of any data access request.

(i) The person to whom requests for access to data or correction of data or for information regarding policies and practices and kinds of data held are to be addressed is as follows:

The Data Protection Officer,
The Hongkong and Shanghai Banking Corporation Limited,
PO Box 72677,
Kowloon Central Post Office,
Hong Kong SAR

Email: dfv.enquiry@hsbc.com.hk

(j) Nothing in this Notice shall limit the rights of customers under the Ordinance.

(k) In this Notice, the terms "HSBC Group" and "HSBC Group companies" mean HSBC Holdings plc and its group companies, where "group companies" has the same meaning given to it under the Companies Ordinance of Hong Kong SAR.