

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

HSBC Life (International) Limited (“HSBC”)

- a) From time to time, it is necessary for individuals to supply HSBC with data in connection with the provision, continuation and administration of insurance contracts or other financial products and services by HSBC or compliance with any laws, guidelines or requests issued by regulatory or other authorities.
- b) Failure to supply such data promptly may result in HSBC being unable to provide or continue to provide products and services.
- c) It is also the case that data are collected from (i) individuals in the ordinary course of the continuation of the relationship, (ii) a person acting on behalf of the individual whose data are provided, and (iii) other sources available to HSBC. Data may also be generated or combined with other information available to HSBC or any member of the HSBC Group (“**HSBC Group**” means HSBC Holdings plc, its affiliates, subsidiaries, associated entities and any of their branches and offices (together or individually) and “**member of the HSBC Group**” has the same meaning).
- d) The purposes for which data may be used are as follows:
- i) considering applications for products and services and offering, providing, maintaining and managing products and services to customers and the operation and administration of the products and services (including without limitation, insurance, provident fund or scheme, credit facilities or other financial products or services) provided to customers which may include, without limitation, underwriting, administration or evaluation of an insurance policy or product;
 - ii) conducting identity, medical or credit checks;
 - iii) creating and maintaining the credit and risk related models of HSBC and the HSBC Group;
 - iv) 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 a member of the HSBC Group including, without limitation, making, defending, analysing, investigating, processing, assessing, determining, responding to, resolving or settling such claims;
 - v) designing insurance and other financial products and/or services for customers’ use;
 - vi) marketing services, products and other subjects as described in paragraph (f) below;
 - vii) determining the amount of indebtedness owed to or by a customer and collecting amounts outstanding from a customer and those providing security for customers’ obligations;
 - viii) meeting obligations, requirements or arrangements, whether compulsory or voluntary, of HSBC or any of its branches or any member of the HSBC Group to comply with, or in connection with:
 - 1) any law, regulation, judgment, court order, voluntary code, sanctions regime, within or outside the Hong Kong Special Administrative Region (“**Hong Kong**”) existing currently and in the future (“**Laws**”);
 - 2) any guidelines, guidance or requests 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 Hong Kong existing currently or in the future and any international guidance, internal policies or procedures;
 - 3) any present or future contractual or other commitment with local or foreign legal, regulatory, judicial, administrative, public or law enforcement body, or governmental, tax, revenue, monetary, securities or futures exchange, court, central bank or other authorities, or self-regulatory or industry bodies or associations of financial service providers or any of their agents with jurisdiction over all or any part of the HSBC Group (together the “**Authorities**” and each an “**Authority**”) that is assumed by, imposed on or applicable to HSBC or any of its branches or any member of the HSBC Group; or
 - 4) any agreement or treaty between Authorities;
 - ix) 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 programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
 - x) conducting any action to meet obligations of HSBC or any member of the HSBC Group to comply with Laws or international guidance or regulatory requests relating to or in connection with the detection, investigation and prevention of money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions and/or any acts or attempts to circumvent or violate any Laws relating to these matters;

- x) meeting obligations of HSBC or any member of the HSBC Group to comply with any demand or request from Authorities;
 - xii) exercising any rights HSBC or a member of the HSBC Group may have in connection with the products or services provided to a customer;
 - xiii) matching any data held by HSBC or a member of the HSBC Group relating to a data subject from time to time for any of the purposes listed in this paragraph (d);
 - xiv) enabling an actual or proposed assignee or transferee of HSBC or any member of the HSBC Group, or participant or sub-participant of HSBC's or any member 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 or a member of the HSBC Group relating to an individual will be kept confidential but HSBC or a member of the HSBC Group may provide such information to the following parties (whether within or outside Hong Kong) for the purposes set out in paragraph (d):
- i) any agents, contractors, sub-contractors, service providers, reinsurers or associates of the HSBC Group (including their employees, directors, officers, agents, contractors, service providers and professional advisers);
 - ii) any third party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to HSBC in connection with the operation of its businesses (including their employees, directors and officers);
 - iii) any Authorities;
 - iv) any person under a duty of confidentiality to HSBC including a member of the HSBC Group which has undertaken to keep such information confidential;
 - v) any person in the context of the sale or transfer by HSBC or any member of the HSBC Group 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 or transfer;
 - vi) credit reference agencies and, in the event of default, any debt collection agencies;
 - vii) any person to whom HSBC or any of its branches or any member of the HSBC Group is under an obligation or required or expected to make disclosure for the purposes set out in paragraph (d)(viii), (d)(ix), (d)(x) or (d)(xi);
 - viii) any actual or proposed assignee or transferee of HSBC or any member of the HSBC Group or participant or sub-participant of HSBC's or any member of the HSBC Group's rights in respect of the data subject;
 - ix)
 - 1) any member of the HSBC Group;
 - 2) third party financial institutions, insurers, credit card companies, securities and investment services providers;
 - 3) third party reward, loyalty, co-branding and privileges programme providers;
 - 4) co-branding partners of HSBC or any member of the HSBC Group (the names of such co-branding partners will be provided during the application process for the relevant products as the case may be);
 - 5) charitable or non-profit making organisations; and
 - 6) external service providers (including but not limited to mailing houses, telecommunication companies, telemarketing and direct sales agents, call centres, data processing companies and information technology companies and information technology companies) that HSBC engages for the purposes set out in paragraph (d)(vi);
 - x) 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;
 - xi) any persons acting on behalf of an individual 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 the customer has an interest in securities (where such securities are held by HSBC) or persons acting on behalf of the customer or the individual whose data is provided for the purposes of receiving benefits under an insurance policy; and
 - xii) any party to a transaction or potential transaction acquiring interest in, or assuming or bearing risk in, or in connection with an insurance policy including, without limitation, reinsurers.

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

f) Use of Data in Direct Marketing

HSBC intends to use personal data in direct marketing and HSBC requires the data subject'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 data subject 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;
 - 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) members of the HSBC Group;
 - 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 members of the HSBC Group (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) above for use by them in marketing those services, products and subjects, and HSBC requires the data subject's written consent (which includes an indication of no objection) for that purpose;
- v) HSBC may receive money or other property in return for providing the data to the other persons described in paragraph (f)(iv) above and, when requesting the data subject's consent or no objection as described in paragraph (f)(iv) above, HSBC will inform the data subject if it will receive any money or other property in return for providing the data to the other persons.

If a data subject does not wish HSBC to use or provide to other persons his data for use in direct marketing as described above, the data subject may exercise his 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 and of access to such data;
 - ii) to require HSBC to correct any data relating to him 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 be informed on request 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 data subjects under the Ordinance.