

DATA PROTECTION POLICY

We at Crédit Industriel et Commercial, Singapore Branch (“**CIC**”) take our responsibilities under the Personal Data Protection Act 2012 (the “**PDPA**”) and other applicable data protection and privacy laws, such as the European Union’s General Data Protection Regulation (“**GDPR**”) seriously. We also recognise the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Data Protection Policy is designed to assist you in understanding how we collect, use and/or disclose the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the “**DPO**”) at:

cicsg_dpo@cic.asia

1 INTRODUCTION TO THE PDPA

- 1.1 “Personal data” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, financial records, credit card information, photographs and video images.
- 1.2 We will collect your personal data in accordance with the PDPA. In general, before we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used and/or disclosed, as well as obtain your consent for the collection, use and/or disclosure of your personal data for the intended purposes.
- 1.3 Your personal data may also be collected, used or disclosed if we have assessed that to do so would be in our legitimate interests and beneficial to the public. Before doing so, we will take steps to ensure that any adverse effects that might arise for you have already been identified and eliminated, reduced or mitigated.

2 PURPOSES FOR COLLECTION, USE & DISCLOSURE OF PERSONAL DATA

- 2.1 The personal data which we collect from you may be collected, used and/or disclosed for the following purposes:
 - (a) Considering and/or processing your application/transaction with us;
 - (b) Facilitating, processing, dealing with, administering, managing and/or maintaining your relationship with us, including but not limited to handling feedback or complaints;
 - (c) Providing you with our services and products, as well as services and products provided by other external providers provided through us;
 - (d) Carrying out your instructions or responding to any enquiry given by (or purported to

be given by) you or on your behalf;

- (e) Contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering and/or managing your relationship with us such as but not limited to communicating information to you related to your account/banking facilities/transaction with us;
- (f) Conducting credit checks, customer due diligence or other screening activities (including background checks) in accordance with laws, regulations and policies including our internal policies;
- (g) Preventing or investigating any fraud, unlawful activity or omission or misconduct, whether relating to your relationship with us or any other matter arising from your relationship with us, and whether or not there is any suspicion of the aforementioned;
- (h) Complying with or as required by any applicable law, governmental or regulatory requirements of any relevant jurisdiction, including meeting the requirements to make disclosure under the requirements of any law binding on us and/or for the purposes of any guidelines issued by regulatory or other authorities, whether in Singapore or elsewhere, with which we are expected to comply;
- (i) Complying with or as required by any request or direction of any governmental authority; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities (including but not limited to the Monetary Authority of Singapore, Inland Revenue Authority of Singapore, Insolvency & Public Trustee's Office, Commercial Affairs Department and courts). For the avoidance of doubt, this means that we may/will disclose your personal data to the aforementioned parties upon their request or direction;
- (j) Conducting research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve our services and facilities in order to enhance your relationship with us or for your benefit, or to improve any of our products or services for your benefit;
- (k) Financial reporting, regulatory reporting, management reporting, risk management (including monitoring risk exposure) audit, record keeping purposes;
- (l) Managing our business operations or complying with internal policies and procedures; and
- (m) Enforcing obligations owed to us, (collectively, the "**Purposes**").

2.2 In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, which may be sited outside of Singapore, for one or more of the above-stated Purposes. This is because such third party service providers, agents and/or affiliates or related corporations would be processing your personal data on our behalf for one or more of the above-stated Purposes.

3 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

3.1 We respect the confidentiality of the personal data you have provided to us.

3.2 In that regard, we will not disclose any of your personal data to any third parties without first obtaining your express consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:

- (a) cases in which the disclosure is required based on the applicable laws and/or regulations, such as the Banking Act (Cap. 19);
- (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way, provided that we shall, as soon as may be practicable, notify you of the disclosure and the purposes of the disclosure;
- (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- (d) cases in which there are reasonable grounds to believe that the health or safety of yourself or another individual will be seriously affected and consent for the disclosure of the data cannot be obtained in a timely way;
- (e) cases in which the disclosure is necessary for any investigation or proceedings;
- (f) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
- (g) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or
- (h) where such disclosure without your consent is permitted by the PDPA or bylaw.

3.3 The instances listed above at paragraph 3.2 are not intended to be exhaustive. For an exhaustive list of exceptions, you are encouraged to peruse the First and Second Schedules of the PDPA which is publicly available at <https://sso.agc.gov.sg/>.

3.4 In all other instances of disclosure of personal data to third parties with your express consent, we will endeavor to provide adequate supervision over the handling and administration of your personal data by such third parties, as well as to provide for adequate forms of protection over such personal data.

3.5 Where personal data is transferred by us to any third parties outside of Singapore, we will ensure that such transfers are compliant with the requirements under the PDPA. In this regard, we will take such necessary measures to ensure that such overseas recipients are bound by legally enforceable obligations to ensure that these overseas recipients provide a standard of protection to the personal data so transferred that is comparable to the protection under the PDPA.

4 REQUEST FOR ACCESS, CORRECTION AND/OR PORTING OF PERSONAL DATA

You may request to access, correct and/or port the personal data currently in our possession at any time by submitting your request through the following methods:

- (a) E-mail : cicsg_dpo@cic.asia
- (b) Office address : 182 Cecil Street
#33-01 Frasers Tower
Singapore 069547

5 REQUEST TO WITHDRAW CONSENT

- 5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control at any time by submitting your request to the contact details listed below at paragraph 7.2.
- 5.2 We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter refrain from collecting, using and/or disclosing your personal data in the manner stated in your request.
- 5.3 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your existing relationship with us or the contract you have with us may have to be terminated.

6 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

- 6.1 We will take appropriate measures to keep your personal data accurate, complete and updated, if your personal data is likely to be used by us to make a decision that affects you, or disclosed to another organization. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your failure to update us of any changes in your personal data that you had initially provided us with.
- 6.2 We will also take commercially reasonable efforts to take appropriate precautions and preventive measures to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.
- 6.3 We will also take commercially reasonable efforts to ensure that the personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.
- 6.4 Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies, and taking appropriate steps to ascertain that the foreign recipient organization of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the Act. This may include us entering into an appropriate contract with the foreign recipient organization dealing with the personal data transfer or permitting the personal data

transfer without such a contract if the PDPA or law permits us to.

7 COMPLAINT PROCESS

- 7.1 If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.
- 7.2 Please contact us through one of the following methods with your complaint or grievance:
- (a) E-mail: cicsg_dpo@cic.asia (Attention it to the “Data Protection Officer”)
 - (b) Office address: 182 Cecil Street
#33-01 Frasers Tower
Singapore 069547
(Attention: Data Protection Officer)
- 7.3 Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in CIC to handle. For example, you could insert the subject header as “**PDPA Complaint**”.
- 7.4 We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

8 UPDATES ON DATA PROTECTION POLICY

- 8.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.
- 8.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy will be posted on our website.
- 8.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

9 GDPR

- 9.1 If you are based in the European Union, and if we are processing activities related to the offering of goods or services, the GDPR applies to us as a controller. We will always process your data in accordance with GDPR.
- 9.2 As a controller, we may collect and process your personal data as necessary to enable us to carry out the services you request, to manage and operate our business and to comply with our legal and regulatory obligations.
- 9.3 We may share your data with our affiliated or related companies or entities, any agents, contractors, service providers and advisors we work with to provide services to you and to run our business, official authorities, our regulators, central and local government, law enforcement agencies, judicial bodies and fraud prevention agencies, as necessary to comply with our legal

and regulatory obligations; and other financial institutions, lenders, credit reference agencies and payment service providers, as necessary to provide the services you have requested.

- 9.4 We use industry standard technical and organizational measures to protect information from the point of collection to the point of destruction.
- 9.5 Personal data received by us will only be retained for as long as necessary to fulfil our engagement. Following the end of our engagement we will retain your information, to enable us to respond to any queries, complaints or claims made by you or on your behalf; and to the extent permitted for legal, regulatory, fraud and other financial crime prevention and legitimate business purposes.
- 9.6 You have the right, in particular, to access to your information, and updating your information; to object, or delete your data. You can exercise any of your rights by submitting your request as set out in paragraph 4 above.

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