

**HONG LEONG BANK (CAMBODIA) PLC
PRIVACY POLICY**

Version: June 2020

1. Personal Data Confidentiality

- 1.1. Hong Leong Bank (Cambodia) PLC (hereinafter referred to as the 'Bank') strive to protect the confidentiality of the personal information ('Data') of customers, employees and business counterparts (hereinafter collectively referred to as 'Data Subjects'), that has been provided to the Bank. This Policy is accordingly addressed to these Data Subjects in the jurisdiction of Cambodia.
- 1.2. This Policy is developed to assist you, as a Data Subject, in understanding how we collect, disclose, transfer and store your personal information and how we intend to deliver the rights and protection that you are entitled to.
- 1.3. Ensuring the security of your personal information is our priority. We strive to protect the confidentiality of this information by maintaining appropriate physical, electronic and procedural safeguards. We invest in systems and infrastructure to minimize any risks of compromising data security. Each of our employees is also bound by our Code of Conduct and Ethics which requires them to maintain customer confidentiality.
- 1.4. When we use other company (ies) to provide services to you for and on our behalf (hereinafter referred to as the 'Service Providers'), we will also require them to protect the confidentiality of your personal information that they may receive.
- 1.5. In relation to Clause 1.4 above and Clause 4.2 below, please understand that we will only share your information with our Service Providers and business partners in accordance with this Policy.

2. Choice to Supply Personal Data

- 2.1. As a Data Subject, you are provided opportunities to make choices. We encourage you to make choices that enable us to provide you with quality products and services that help you to meet your financial needs and objectives.
- 2.2. The collection of data by the Bank may be mandatory or voluntary/optional in nature in order to establish or continue to enjoy the Bank's financial services and/or establish any other business relationships with the Bank.
- 2.3. It is necessary for you to provide data which are mandatory. If you choose not to supply such data, this may result in the Bank being unable to provide products and/or services or otherwise deal with you.
- 2.4. We endeavour to keep you informed of the latest marketing and promotional offers that we feel would be useful and beneficial to you. These may include programs you may find valuable in helping you manage your account; such as product or service upgrades, credit/financing line increases and other benefits.
- 2.5. However, you can choose not to receive these marketing and promotional offers. You can do so by informing the Bank. Your request will be processed and no fees will be charged.

3. Types of Personal Data Collected

- 3.1. Personal data is described as information relating directly or indirectly to an individual who is identified or can be identified from that information.
- 3.2. The types of personal data collected may vary according to the business relationship that is established. Data collected may include the following:
 - ❖ Data collected on applications or other forms or as provided by you, such as name, identity card number or passport number (for foreigners), address, e-mail address, telephone number, occupation, financial position such as assets and income, investment objectives, employer's details, family members and personal information about them and such other information as may be relevant for your application;
 - ❖ Data about your transactions with the Bank, its Service Providers, business partners or third parties, such as account balances, payment history and account activity;
 - ❖ Data from credit bureau reports;
 - ❖ Data from credit reporting agencies;
 - ❖ Data from governmental agencies, regulatory and statutory authorities;
 - ❖ Data from your joint account holder(s) and/or parties providing security for your facilities and/or all such persons named in your application for our products and services or such other documents in support of your application including but not limited to directors, individual shareholders, authorised signatories, guarantors and you confirm and warrant that you have obtained the consent of all such individuals for their respective data to be processed by us;
 - ❖ Data obtained from your access to the Bank's web server, for example, by the use of cookies, i.e. small text files, sent by the Bank's server to your system when you access the Bank's server;
 - ❖ Data for insurance products;
 - ❖ Recorded footage from Closed Circuit Televisions (CCTV) installed at our premises and self-service terminals;
 - ❖ Images (including photographs) video and/or audio recordings at our premises or at events organised by or for Hong Leong Group of Companies; and/ or
 - ❖ Data from publicly available sources.

4. Use of Personal Data

- 4.1. The Bank collects your data for the provision of financial services or products requested by you in order to meet your financial needs and objectives.
- 4.2. In addition to the above, the Bank may also make arrangements with business partners to jointly develop products and services or launch marketing campaigns that may involve the sharing of your personal information.
- 4.3. Your personal data may be used or processed by the Bank or the Bank's Service Providers for the following purposes:-
 - ❖ To establish a relationship between you and the Bank and/or companies related to or affiliated to the Bank, the Bank's Service Providers and business partners;

- ❖ To process applications for products and services;
 - ❖ To evaluate and monitor credit/financing worthiness;
 - ❖ For evaluation and due diligence purposes;
 - ❖ For the provision of products and services to you, whether through face-to-face banking or through electronic means, including processing of receipts and payments, automatic teller machine services and credit and charge cards;
 - ❖ For data processing purposes;
 - ❖ To evaluate and monitor provision of services;
 - ❖ To respond to inquiries from you;
 - ❖ To understand your needs and offering products and services to meet those needs;
 - ❖ For the research and development of products and services for customers' use;
 - ❖ To allow the Bank, the Bank's related and/or affiliated companies, Service Providers and business partners to promote their products and services;
 - ❖ For debt collection purposes;
 - ❖ For enforcement of our rights and obligations of other parties to us and/or our affiliates;
 - ❖ For assessing, processing and investigating insurance risks and claims;
 - ❖ For deposit insurance purposes;
 - ❖ To enable a party to evaluate any actual or proposed assignment, participation, sub-participation and/or novation of our rights and/or obligations;
 - ❖ To meet legal and regulatory requirements, which may include disclosure, notification and record retention requirements;
 - ❖ To maintain and protect our premises and all self-service terminals offices;
 - ❖ For audit and risk management;
 - ❖ For any proposed or actual merger, sale, transfer or proposed transfer of any part of the Bank's interests, assets obligations, business and/or operations;
 - ❖ To conduct credit checks (including but not limited to upon any application of our loan products and upon periodic or special review of the loan which will normally take place once or more every year);
 - ❖ To fulfill the direction and/or to provide co-operation with any governmental authority and/or agencies of any country and/or jurisdiction;
 - ❖ For such other purposes as permitted by applicable law or with your consent; and/or
 - ❖ For all other purposes incidental and associated with any of the above.
- 4.4. CCTV footage, photos and/or images in particular, may also be used for the following purposes:
- ❖ for quality assurance purposes;
 - ❖ for public safety;
 - ❖ detecting and deterring suspicious, inappropriate or unauthorised use of our facilities, products, services and/or premises;
 - ❖ detecting and deterring criminal behavior; and/or
 - ❖ conducting incident investigations.

5. Disclosure of Personal Data

For the purposes above and for purpose of assisting you, your personal data may be provided by the Bank to:-

- ❖ Any person under a duty of confidentiality to the Bank or to companies related to or affiliated to the Bank;
- ❖ Companies related to or affiliated to the Bank (whether such company operates in Cambodia or elsewhere);
- ❖ Any financial institution granting or intending to grant any credit/financing facilities to you, the Credit Bureau of Cambodia, any other relevant authority as may be authorized by law to obtain such information, authorities/agencies established by the National Bank of Cambodia and/or any other person as may be authorized by law or any government authority and/or regulatory authority and/or any industry related association;
- ❖ Any relevant agent, contractor or third party's Service Provider who provides administrative, telecommunications, computer, payment, securities clearing, management, audit or other services to the Bank;
- ❖ Any banking, financial or other institution with which you have or propose to have dealings with;
- ❖ Any credit reference agency or debt collection agencies;
- ❖ Lawyers, auditors, tax advisors, investment banks and other professional advisors which is restricted to the nature of the business relationship in which you are involved in with the Bank;
- ❖ Any insurance company operators and any association or federation of insurance companies operators;
- ❖ Any person or corporation to whom the Bank mergers/ transfers/ sells or proposes to merger/ transfer/ sell any part of its interests, assets, obligations, business and/or operations;
- ❖ Any nominee, trustee, co-trustee, centralised securities depository or registrar, custodian, estate agent, solicitor or other person who is involved with the provision of services or products by the Bank to you;
- ❖ Any governmental authority and/or agencies of any country or jurisdiction (when required);
- ❖ Any person by whom the Bank is required by applicable legal, governmental or regulatory requirements to make disclosure;
- ❖ any other person reasonably requiring the same in order for the Bank to carry out the activities set out in the above purposes; and/or
- ❖ Companies and/or organisations which are our agents, affiliates, service providers, business partners, professional advisers, other banks and/or financial institutions, in or outside Cambodia.

6. Right to Access and Correct Personal Data

- 6.1. You are entitled to ask whether the Bank holds data on you and to request access to and the correction of any such data held. You will be required to fill up a form and a

reasonable administrative fee may be charged for processing each data access request.

- 6.2. If you wish to make any request for access to, or to correct data held by the Bank, please forward your request to the Bank's Contact Center or at the telephone number currently stated at the Bank's website (www.hlb.com.kh) and we will facilitate the fulfillment of your request as soon as possible.

7. Amendments to Privacy Policy

- 7.1. This Policy may be reviewed and amended from time to time. We will communicate such changes along with the updated Policy on the Bank's website (www.hlb.com.kh), and/or other appropriate communication means as may be determined by the Bank.