

Data Protection Information Notice

With Immediate Effect

This data protection information notice (the **Data Protection Information Notice**) has been drawn up in connection with the obligation to provide information arising under DIFC Data Protection Law 2007, as amended by DIFC Laws Amendment Law No. 5 of 2012 and DIFC Laws Amendment Law No. 1 of 2018 ("**Data Protection Law**") as well as Article 13 and Article 14 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the **General Data Protection Regulation** or **GDPR**) and any other data protection laws that apply to China Construction Bank (DIFC Branch) (**CCB (DIFC) Branch**) in other regions.

From 25 May 2018, companies (including financial institutions) based in the UAE will need to consider the extent to which they may fall within the scope of the European Union's General Data Protection Regulation ("GDPR"), this has resulted to significant enhancement to the data protection for individuals in the European Union as well as affected individuals based in United Arab Emirates. We take the privacy and security of personal data seriously and responsibly and this Data Protection Information Notice therefore contains specific information on the processing by CCB (DIFC) Branch, DFSA License No. F003409 (hereinafter the **Bank** or **we** or **us** or **our**) of personal data of individuals who are in our systems because of the business relationship between us and the corporate/institutional client (the **Related Client** or **Related Entity** or **Related Clients**) to which such individuals relate to/are associated with (each such individual, hereinafter **you** or **your** and collectively in relation to a Related Client, **All its Related Individuals**) and us in order to provide services and products to our Related Clients.

This Data Protection Information Notice applies to information held about you. The Related Client must ensure that All its Related Individuals are made aware of this Data Protection Information Notice and the individual rights and information it sets out, prior to providing their information to us or our obtaining their information from another source. If the Related Client, or anyone else on your behalf, has provided or provides information on you to us (or to any of our affiliates), they must first ensure that they have the authority to do so.

If you have questions regarding the Data Protection Information Notice or individuals' rights under it, feel free to contact our *Data Protection Officer / Coordinator* at the postal address or email address mentioned in this Data Protection Information Notice at section 1 below.

1. Who is responsible for the data processing and who can you contact in this regard?

China Construction Bank (DIFC Branch)

To the attention of the Data Protection Officer / Coordinator

1. Unit 3101, 3102, 3103 & 3104, Level 31,

Al Fattan Currency House Tower 2

Dubai International Financial Centre

Dubai, PO Box 128220

United Arab Emirates

Via e-mail: [\[compliance@ae.ccb.com\]](mailto:compliance@ae.ccb.com)

2. What sources and data do we use

We process personal data that we receive from or about you in your capacity as the authorised representative / agent of the legal entity / ultimate beneficial owner or contact person in relation to the prospective and / or existing Related Client. We also process personal data from publicly available sources (e. g. commercial registers and registers of associated media, Internet) which we lawfully obtain and are permitted to process.

Relevant personal data of the authorised representative / agent / ultimate beneficial owner / contact persons, collected:

- Name, address / other contact information (telephone, email address), date / place of birth, gender, nationality, marital status, family relationship, legal capacity, employed / self-employed, identification data (e. g., identification document data), authentication data (e. g., specimen signature), tax-ID.
- When products / services are purchased and used, additional personal data may be collected, processed and stored in addition to the aforementioned data. These primarily include: Information and records on knowledge of and / or experience with securities, interest rate / currency products / financial investments (client classification status: suitability / appropriateness test), ownership (e.g. pledged goods).

3. Why do we process your data (purpose of the processing) and on what legal basis

We process the aforementioned personal data in compliance with the provisions of the DIFC Data Protection Law (DPL) and other applicable data protection law applicable to us in other regions.

a. for the performance of contractual obligations (article 9b) DPL)

The processing of personal data is carried out in order to perform banking transactions and financial services pursuant to contracts with our Related Clients or to take steps prior to entering into a contract.

For further details on the purpose of the data processing, please refer to the respective contractual documentation and terms and conditions the Related Client has agreed with us.

Standard Terms & Conditions can be found at <http://ae.ccb.com/dubai/en/index.html>

b. for compliance with a legal obligation (article 9 c) DPL)

We use your personal data to comply with various legal and regulatory obligations, including:

- banking and financial regulations in compliance with which we set up security measures in order to prevent abuse and fraud, detect transactions which deviate from the normal patterns and record, when necessary, phone calls;
- prevention of money-laundering and financing of terrorism;
- reply to an official request from a duly authorised public or judicial authority.

c. for the purposes of safeguarding legitimate interests (article 9e DPL)

Where necessary, we process your data above and beyond the actual performance of our contractual obligations in order to safeguard the legitimate interests pursued by us or by a third party. Examples:

- Asserting legal claims and mounting a defense in the event of litigation
- Ensuring the Bank's IT security and IT operations
- Voice recording for traceability and / or regulatory purposes
- Preventing crimes
- Video surveillance to safeguard against trespassers and to gather evidence in the event of robbery or fraud
- Measures for building and systems security (e. g. admittance control)
- Measures to ensure against trespassing

d. on the basis of your consent (article 9 a) DPL)

We may process your personal data on the basis of your consent. In such a case, you could revoke that consent at any time.

This also applies to the revocation of declarations of consent that are granted by you prior to the entry into force of the EU General Data Protection Regulation., i.e. prior to 25 May 2018 or upon receiving this Data Protection Information Notice, whichever is earlier.

Please be advised that the revocation will only take effect in the future and does not apply to processing carried out prior thereto.

4. Who do we share your personal data with

In order to fulfill the aforementioned purposes, we only disclose your personal data, on a lawful basis, to:

- Affiliates of our Bank;
- Service providers which perform services on our behalf;
- Financial or judicial authorities, state agencies or public bodies, upon request and to the extent permitted by law;
- Certain regulated professionals such as lawyers, notaries or auditors.

5. Is data transferred to a third country or to an international organization

In case of international transfers originating from the European Economic Area (EEA) where the European Commission has recognized a non-EEA country as providing an adequate level of data protection, your personal data may be transferred on this basis.

For transfers to non-EEA countries whose level of protection has not been recognized by the European Commission, we will either rely on a derogation applicable to the specific situation (e.g. if the transfer is necessary to perform our contract with your Related Client such as when making an international payment) or implement Standard contractual clauses approved by the European Commission to ensure the protection of your personal data.

To obtain a copy of these safeguards or details on where they are available, you can send a written request to the *Data Protection Officer / Coordinator* at the postal address or email address mentioned in section 1 above.

6. For how long will we keep your personal data

We will retain your personal data for the longer of the period required in order to comply with applicable laws and regulations or another period with regards to our operational requirements, such as proper account maintenance, facilitating client relationship management and responding to legal claims or regulatory requests. If the data are no longer required for the performance of our contractual and statutory obligations, they are regularly deleted, unless their further processing (for a limited time) is necessary for the following purposes:

- Compliance with records retention periods under commercial and tax law, laws relating to the accounts of credit institutions, regulations on the prevention of the use of the financial system for the purpose of money laundering or terrorist financing and financial sector law. The records retention periods prescribed therein at least 6 years.

Preservation of evidence within the scope of statutes of limitations as required under local law.

7. What data protection rights do you have

Every data subject has a right of access and a right to rectification (article 13 (1)(c)(iii) DPL), , a right to erasure (article 17 DPL), a right to object or restriction of processing (article 18 DPL). Data subjects also have a right to lodge a complaint with the supervisory authority (article 34 DPL). You may revoke your consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent that are granted prior to the entry into force of the EU General Data Protection Regulation, i.e., prior to 25 May 2018 or upon receiving the Data Protection Information Notice, whichever is earlier. Please be advised that the revocation will only take effect in the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

We provide you with a data subject rights request form (the **Form**) allowing you to exercise your rights as a data subject. The Form is enclosed in the appendix to this Data Protection Information Notice.

8. Are you under obligations to provide your personal data

Within the scope of our business relationship with your Related Entity, you must provide personal data which is necessary for accepting and executing any representative authority / authorization and the performance of the associated contractual obligations or which we are legally obliged to collect. As a rule, we would not be able to accept you as the authorised representative / agent without these data or we would have to revoke any existing representative authority / authorization.

In particular, provisions of money laundering law require that we verify your identity before establishing the authority / authorization, for example, by means of your identity card and that we record your name, place of birth, date of birth, nationality and your residential address. In order for us to be able to comply with this statutory obligation, you must provide us with the necessary information and documents and notify us without undue delay of any changes that may arise during the course of the business relationship with your Related Entity.

If you do not provide us with the necessary information and documents, we will not be allowed to institute or continue the representative authority / authorization requested by your Related Entity.

9. Information on your right to object under article 18 of the Data Protection Law (DPL)

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on article 18 DPL (processing for the purposes of safeguarding legitimate interests).

If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or unless the processing is for the establishment, exercise or defense of legal claims.

10. Status of this Data Protection Information Notice

We reserve the right to amend this Data Protection Information Notice from time to time. If this Notice is updated, we will take steps to inform you of the update by appropriate means (e.g. through publication of such notice on CCB (DIFC) Branch's official website), depending on how we normally communicate with you. You may submit objections to us with the Form enclosed in appendix hereto.

Appendix

Data Subject Rights Request Form

Under the Data Protection Law (“DPL”), you can exercise specific rights as data subject when China Construction Bank (DIFC Branch) processes your personal data.

This includes accessing and rectifying your data, requesting transfer of your data to another party, requesting erasure of your data, restricting or objecting to a processing.

Because we might receive several similar requests, completing this form will help us deal with your request in a timely manner.

1. About you

Civility* (Sir/Madam/Miss):

First name*:

Last name*:

Type of relationship with us:

Current address*:

Former address:
(If changed within the last 6 months)

Phone number:

Email address*:

* Please provide a proof of your identity (copy of your national identity card or passport).

2. The person concerned (if you are acting on someone's behalf)

Civility* (Sir/Madam/Miss):

First name*:

Last name*:

Type of relationship with us:

Current address:

Former address:
(If changed within the last 6 months)

Phone number:

Email address*:

* Please provide any information justifying the fact you can act on behalf of the person concerned (e.g. you are his/her legal representative, he/she gave you a proxy, etc.).

* Please provide a proof of his/her identity (copy of national identity card or passport).

3. What could we be of help for you? (please check your choice)

- Provide you with information with regards to our usage of your personal data
- Correct some of your data
- Obtain a copy of your data
- Transfer your data to another party
- Restrict a processing using your personal data
- Object to a processing using your personal data
- Delete some or all of your data

4. Please explain your request (provide as much details as possible)

5. Enclosures (provide details of the information enclosed to this form)

6. Declaration

I,hereby certify that the information provided in this form is accurate. I understand that the bank could request more information from me in order to help fulfil my request.

Signature:

Date:

Please send us this form by email to: [Compliance@ae.ccb.com]

Or return the form by mail to:

Data Protection Officer / Coordinator

China Construction Bank (DIFC Branch)

Unit 3101, 3102, 3103 & 3104, Level 31, Al Fatten Currency Tower 2, Dubai International Financial Centre, Dubai, PO Box 128220, United Arab Emirates