

Privacy Policy

Last updated: 18 July 2023

1. Who we are?

We are China Construction Bank Corporation (ARBN 125 167 553) (**CCB**), the Australian branch of the China Construction Bank Corporation, a company incorporated in the People's Republic of China.

2. Protecting your personal information

We respect your personal information and this Privacy Policy explains how we handle it. We are committed to protecting your personal information in accordance with applicable data protection laws, including the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (**APPs**).

3. For customers based in the UK/EEA

If you are a resident of the UK or a country that is in the European Economic Area (**EEA**), then there are certain additional rights that may be applicable to you under the European General Data Protection Regulation (EU) 2016/679 and the UK GDPR as defined by the Data Protection Act 2018 (both referred to as the **GDPR** for the purposes of this Privacy Policy).

CCB is a controller and processor for the purposes of the GDPR.

The factual elements regarding how we handle your personal information are consistent with this Privacy Policy (i.e., the types of personal information, how we collect and store that information and the purposes for processing etc.) If you are based in the UK/EEA, you should therefore read this Privacy Policy in its entirety, before noting Annex 1 below which sets out the additional information and rights applicable to you under the GDPR.

4. What is personal information?

In Australia, **personal information** means information or an opinion about an identified, or reasonably identifiable individual, whether or not that information or opinion is true or is in a material recorded form.

This is different to **sensitive information** which is information about your racial or ethnic origin, political persuasion, religious or philosophical beliefs, memberships in trade or professional associations, sexual preferences, criminal record, health or genetic information and some aspects of biometric information and biometric templates.

5. What types of personal information do we collect?

The kinds of personal information we may collect and hold, includes:

- **(Identity information)** your name, address and date of birth and other government identifiers used to verify your information such as passport and driver's licence. We may also ask for details about your immediate family members to satisfy our anti-money laundering and counter-terrorism requirements.
- **(Contact details)** your address, phone number and email address.
- **(Employment details)** your profession, occupation or job title. If you apply for a job with us and are not successful, we may keep records about your candidacy including your application and education qualifications.
- **(Financial information)** bank account information, income, assets and liability information, and financial statements.
- **(Tax information)** your tax file number and other tax-related information (whether in Australia or overseas) including tax residency details.
- **(Our interactions with you)** your history of transactions and interactions with us including timing and the content of any details you provided in updates, additional information, communications with customer representatives, responding to customer surveys, providing feedback or raising a complaint.
- **(Social media)** if we release articles or material on social media, we may collect information from your comments, responses or interactions.

Sometimes we need to collect sensitive information about you, for instance your criminal history when we complete background checks on you if you apply for a job with us. We will only collect sensitive information with your consent (unless the collection of such information without obtaining your consent is required by law).

6. How do we collect your personal information?

We usually collect personal information directly from you when you deal with us, by completing an application for CCB financial products and services, by telephone, mail, fax, email, social media or when you visit the CCB website.

Sometimes we may also obtain personal information about you from third parties, such as trade credit referees, law enforcement agencies and other government entities.

If you do not provide us with the information we request, we may not be able to process or assess your application to provide you with CCB financial products or services, or to interact or engage with your employer or principal or if you are a guarantor, provide our financial products or services to the relevant CCB customer.

7. How do we hold your personal information?

We usually hold your personal information either in hardcopy (paper) form or in electronic form. We will keep your hardcopy or electronic records on our premises and systems (or that of CCB or our related bodies corporate) or off site using trusted third parties that may be located overseas.

We will take reasonable steps to protect your personal information by storing it in a secure environment. We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure. We have security procedures in place to protect your personal information.

In order to satisfy our legal obligations, we may need to retain personal information even after the closure of an account (subject to our obligations under applicable laws).

8. Purpose, use and disclosure of your personal information

We collect, use and hold personal information about you for a number of reasons but mainly so that we can provide you with wholesale banking services and related financial products and services as a customer, or if you are an authorised signatory of a customer or if you are a guarantor, to a CCB customer.

The purposes for which we collect, hold, use and disclose your personal information are to:

- assess your applications for our financial products and services;
- to provide you with a financial product or service;
- to provide you with further information about other products or services we can offer;
- to fulfil our legal obligations to identify customers under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (the AML/CTF Act) and other applicable laws;
- to send communications about or supply products and services when requested by you;
- to answer enquiries and provide information or advice about existing and new services;
- to provide you with access to protected areas of the CCB website;
- to assess the performance of the CCB website and to improve the operation of the website;
- to update CCB records and keep your contact details up to date;
- to process and respond to any access request or complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority, including, the AML/CTF Act, tax laws, and other State and Territory laws.

9. Who do we disclose your information to?

Any personal information which we may collect about you may be used by us for the purposes explained in the section above, or any related purposes.

We may disclose your personal information to:

- our related bodies corporate
- other organisations who we have relationships and agreements with to provide products and services to us;
- our IT service providers, who provide, service or maintain applications and websites;
- your guarantors and security providers;

- our professional advisers, including legal and tax advisers, and auditors
- our consultants and service providers;
- any person who represents you, such as finance brokers, lawyers and accountants, or people authorised to represent you;
- clearing and settlement houses;
- intermediaries;
- regulatory bodies, government agencies, enforcement bodies, courts and external dispute resolution schemes; and
- any person where you have provided us with consent to do so.

10. Overseas recipients

We may disclose your personal information overseas, including China. This happens when we send information to CCB Group members overseas or outsourced functions overseas. When we share your personal information with overseas recipients, unless we have obtained your consent pursuant to the APP, we make sure there are appropriate data protection and security arrangements in place.

11. How to access and correct your personal information

You have the right to request access and/or correct the personal information that we hold about you at any time.

If you would us like to provide access or a correction, we recommend that you:

- contact us on the details below under 'Contact us' and set out the details of your access or correction request, including how you would like to access the information if you are requesting access;
- comply with any requests we may have to verify your identity or authority or authority of your third-party representative (if you have one); and
- allow us 30 days to respond to your request.

Our response will set out our reasons for approving or denying your request. Certain access requests may incur a charge for our administrative costs to retrieve your personal information. We will not charge for the making of a request to access, or for making any corrections to your personal information.

If you are unhappy with the outcome of your request, you may provide with feedback or raise a complaint as explained under 'Resolving your privacy concerns and complaints'.

12. Resolving your privacy concerns and complaints

If you have any feedback, questions or wish to raise a complaint about the way that we have handled your personal information (including a breach of the APPs), please contact using the contact details under the 'Contact us' section below.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to investigate your complaint.

We will use our best endeavours to resolve your complaint as quickly as possible.
We will provide you with a response to your complaint within 30 days.

If you are dissatisfied with the outcome of your complaint, you may have the complaint reviewed externally by the Office of the Australian Information Commissioner:

Online: via <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us>

By mail: GPO Box 5218 Sydney NSW 2001

By phone: 1300 363 992 (10am to 4pm AEST/AEDT, Monday to Thursday)

By fax: +61 2 9284 9666

By email: enquiries@oaic.gov.au

13. Contact us

For privacy related matters, including access, correction and complaints, please contact the CCB Privacy Officer on the details below:

Privacy Officer
China Construction Bank Corporation, Sydney Branch
Level 31, 88 Phillip Street
Sydney NSW 2000
Tel: 02 8031 6100,
Email: privacy.officer@ccbaustralia.com

From time to time, it may be necessary for us to review and revise our Privacy Policy. We may vary this Privacy Policy by publishing the updated version on our website.

You may request this Privacy Policy in an alternative form free of charge by contacting us.

ANNEX 1

Processing the personal data of our UK/EEA customers

Annex 1 is for our customers based in the UK/EEA. For our UK/EEA based customers, to the extent that there is any contradiction between our Privacy Policy and this Annex 1, the details set out in Annex 1 below will apply to the handling of your personal data.

(A) What is personal data under the GDPR?

Personal information is referred to as **personal data**, and is any data which directly, or indirectly identifies a natural person, either on its own, or when combined with other data that the organisation holds. The definition is very broad and includes factual data about people (such as names, telephone numbers, addresses, e-mail addresses etc.), as well as expressions of opinion and intentions.

The definition of sensitive personal data, referred to as “special category data” in the GDPR, is consistent with the definition contained in section 4 of our Privacy Policy.

(B) On what legal basis do we handle your personal data?

Under the GDPR, we are required to inform you of the legal basis permitting us to collect and use your personal data.

Primarily, we collect and handle your personal data in order to perform a contract with you (i.e., so that we can provide you with our financial products and services), or for the purpose of our legitimate interests in providing our services to you and to develop our business, for example, to provide you with further information about other products or services we can offer (but only in circumstance where these interests are not outweighed by the need to protect your privacy).

It may also be necessary to collect/handle your personal data to comply with legal requirements placed on us (known as the ‘legal obligations’ ground), such as where we are required to do so by applicable AML/CTF laws.

In instances where we obtain, or are legally required to obtain, your consent to use certain types of personal data, such data is collected and handled in accordance with the GDPR.

Please see section 8 of our Privacy Policy for more information on the purposes for our collection and handling of your personal data.

(C) Is your personal data transferred overseas?

As per section 10 of our Privacy Policy, due to the global nature of our business operations, it is likely that your personal data will be transferred outside of the UK/EEA. We have put in place appropriate protections to ensure that your information is safeguarded to the same standards globally.

(D) How do we keep your personal data secure?

Further to section 7 of our Privacy Policy, in order to keep your personal data securely, we have implemented appropriate technical and organisational measures.

(E) What are your rights over your personal data?

In addition, if you are based in the EEA or the UK, then subject to certain exceptions and limitations you may have various legal rights in relation to your personal data, as set out below. Such rights may allow you to ask us to:

- (i) provide a copy of your personal data;
- (ii) update or correct any inaccuracies in your personal data;
- (iii) modify or withdraw your consent for the collection, use and disclosure of your personal data if and where we rely on consent as the legal basis for handling your personal data;
- (iv) delete your personal data where there is no lawful justification for us to retain it;
- (v) put the processing of your data on hold while, or until such time as:
 - a. we verify any inaccuracies in your personal data that you notify us of; or
 - b. we respond to a claim by you that our legitimate interests in processing your Personal Data are outweighed by your interests in the data not being processed; and
- (vi) transfer your Personal Data to you or another organisation in a commonly used electronic format (known as the right to data portability).

You also may have the right to object to the processing of your personal information, including in the event that we use it for profiling purposes, where we do this:

- for the purposes of our legitimate interests or those of a third party; or
- for direct marketing purposes.

If you lodge an objection on the second ground, we will simply stop processing your personal data for marketing purposes (and any associated profiling). In the case of processing for our legitimate interests, we will stop processing the relevant data unless we identify compelling legitimate grounds for the processing which override your rights and interests or else we need to process the data in connection with a legal claim.

(F) Complaints

As per section 12 of our Privacy Policy, whilst we would appreciate the chance to understand your concerns (and in some instances this may be required by the regulator before they will consider the matter), you have the right to complain to the local data

protection regulator. If you are based in the UK, this will be the [Information Commissioner's Office](#), and if you are based in the EEA, you can find the relevant regulator to you [here](#).

(G)How to contact us

Our contact details are set out in section 13 of our Privacy Policy.