

# China Construction Bank Corporation

## Personal Information Protection Policy Overview

China Construction Bank Corporation and its subsidiaries (“We”) attach great importance to the management of personal information security and privacy protection, and are committed to maintaining the trust and recognition of our clients. We carry out personal client information handling activities in strict accordance with the requirements of the *Civil Code of the People's Republic of China*, the *Data Security Law of the People's Republic of China*, the *Personal Information Protection Law of the People's Republic of China* and other laws and regulations and follow the principles of legality, propriety, necessity and integrity. We are devoted to taking appropriate security protection measures to protect the security of clients' personal information in accordance with law.

### I. Application Scope

We have established a personal information protection system which is applicable to the entire bank and its subsidiaries and covers the business operation processes of all business lines as well as various channel categories such as counter, self-service equipment, websites, apps, official accounts (including service accounts, subscriptions, mini programs, etc.) and H5, to guide all employees to comply with the requirements of and implement the protection measures for personal information security.

### II. Basic Principles

We adhere to the following principles in protecting clients' information: rights commensurate with obligations, clear purpose, informed consent, minimum necessary, hierarchical authorization, safety assurance, openness and transparency, integrity, and information quality. In a clear, understandable and reasonable manner, we clarify the purpose, manner, scope, retention period and other rules for handling personal client information to the subject of personal client information, obtaining clients' independent authorized consent in accordance with law.

### **III. Collection and Use of Personal Information**

#### **i. Definitions**

##### 1. Personal information

Personal information refers to the information recorded by electronic or other means that is related to an identified or identifiable natural person, excluding anonymized information.

The foregoing personal information mainly includes ID information, property information, account information, authentication information, financial transaction information, debit and credit information and other information that reflects some situation of a particular person.

##### 2. Sensitive personal information

Sensitive personal information refers to the personal client information which, once leaked or used illegally, can easily cause clients' personal dignity or personal or property safety to be harmed, including biometric information, religious belief information, specific identity information, health information, financial account information and whereabouts, and the personal client information of juveniles under the age of 14.

#### **ii. Scope of collection and purpose of use**

We follow the personal client information collection principles of “direct relevance, minimum impact, minimum scope and independent choice” and truthfully, accurately and completely inform clients, in remarked ways and clear and easy-to-understand language, of personal information processing matters, the full lifecycle processing measures for the collection, storage, use, processing, transmission, provision, disclosure and deletion of personal information, and the ways and procedures for clients to exercise their rights, in publicly disclosed privacy policy, authorization agreement and other texts. We collect the information that clients enter themselves when using our products or services or information that is generated for using our products or services. The personal client information types collected shall be directly related to the realization of the business functions of products or services. We do not collect client information that is irrelevant to business. When processing of sensitive personal information is involved, we will notify clients of the necessity of processing their sensitive information and its impact on individuals.

In order to provide quality products or services to clients in compliance with the law, the purposes for which personal information is collected and used may specifically include:

- Protecting accounts and e-CNY wallets safety, identifying and verifying clients' identity, etc.
- Assessing performance capability and status for business access and risk prevention and control.
- Providing products or services for clients.
- Protecting capital safety.
- Improving client relationship and service experience.
- Fulfilling legal obligations (e.g., anti-money laundering obligation).
- Other uses prescribed by laws, administrative laws and regulations, or permitted by clients.

### **iii. Collection approach**

Approaches to collecting personal information include: information provided by clients on their own initiative when financial services are provided; information related to services that is formed in the process when financial services are provided to clients; credit information and behavioral information of clients collected from credit reporting agencies, credit management companies, credit standing evaluation agencies or similar institutions permitted by legal or regulatory authorities; necessary information related to services collected from government agencies, judicial authorities and public institutions; necessary information related to the services provided by us from natural persons, legal persons and other organizations that legally keep the information of clients with the authorization of clients; other approaches prescribed by laws, administrative laws and regulations, or permitted by clients.

### **iv. Personal information use scenarios**

Providing clients with our authorized products or services, as well as business function maintenance and improvement; collecting and using information authorized by clients on an ongoing basis during the provision of financial services; aggregation, statistical analysis and processing of service usage (excluding identification information) to enhance product or

service experience and prevent risks; sending clients service status notifications and commercial information about relevant products or services on the premise of obtaining clients' independent and voluntary consent; other uses authorized by clients, necessary for fulfilling statutory duties or obligations and permitted by law and administrative regulations.

When we cease to provide products or services to clients, we will immediately cease our information collection and data analysis and application activities with respect to the clients, unless otherwise specified by relevant national or industry authorities.

#### **IV. Cookies and Similar Technologies**

To ensure the normal operation of the website, we will store small data files called Cookies on clients' computers or mobile devices. Cookies usually contain identifiers, site names, and some numbers and characters. We will not use cookies for any purposes other than those stated in this Policy. Clients can manage or delete cookies according to their preference.

#### **V. Personal Information Storage and Protection**

##### **i. Storage**

We will only retain clients' personal information within the time limit which is necessary for the purposes stated in this Policy and within the time limit prescribed by laws and regulations and regulatory provisions, and will delete any information that is beyond the scope of use or the necessary retention period, or stop any processing except storage and taking necessary security measures (e.g., when it's technically difficult to delete personal information).

We will store personal biometric information separately from personal identity information. The original information on the collection terminal will be deleted after the use of facial verification, vocal print or other means for identification and authentication, and the personal biometric information will only be stored in our servers.

##### **ii. Protection**

We take security measures in line with industry standards to protect personal information and prevent any unauthorized access, external sharing, disclosure, use, modification, damage or loss of data. For instance, we use encryption technology to ensure data security, apply reliable protection mechanisms to protect data from malicious attack, deploy an access

control mechanism to ensure authorized access to personal information, provide training courses on security and personal information protection to enhance employees' awareness of the importance of personal information protection, and organize and conduct personal information protection inspections regularly as well as special inspections for areas prone to risk when appropriate.

If all or part of the business provided by us is discontinued, clients will be informed of the affected products or services in the form of a public announcement or others. Meanwhile, relevant products or services will cease to collect personal information. If all or part of the business is interrupted due to technical failures, cyberattacks, natural disasters and accidents, human factors, etc., we will take emergency response and recovery measures to resume service as soon as possible. If any personal information security incident occurs, we will inform clients of the incident in a timely manner via email, letter or telephone or notice, or make an announcement in a reasonable and effective way pursuant to laws and regulations. At the same time, we will report to regulators on the handling of the personal information security incident in accordance with regulatory requirements.

## **VI. Third Party Management**

We strictly manage and control third parties' processing of our clients' information, conduct strict access review on third party partners, and perform personal information security impact assessment. When providing a client's personal information to a third-party institution, we will provide it to "a specific scenario, inform the client and obtain the client's individual consent" and strictly abide by the requirements on "purpose of collection and use" stated in the Policy. We will also make sure that the client's individual consent is a voluntary behavior with full knowledge.

When we commission a third-party institution to process clients' personal information, we will enter into an agreement with the institution on the purpose of processing, time period of processing, processing method, information types, protection measures, security and confidentiality requirements and both parties' rights and obligations, and provide data and access to the third-party institution in line with the minimum necessary standard. When the commission contract becomes inoperative or invalid or is canceled or terminated, we will require the third-party institution to return, delete and destroy our personal client information involved and log out of relevant systems. The third-party institution cannot sub-

entrust others to process our personal client information without our consent. Regarding third parties that we cooperate with in products or services, we define both parties' responsibilities and obligations on personal client information protection in agreements, contracts, etc., implement security control measures, and urge third parties to strengthen information security management.

We have established a mechanism for supervising and inspecting the use of personal client information based on business scenarios and workflow needs. We inspect the performance of personal client information protection duties of third-party institutions that we partner with according to the cooperation agreement or contract terms signed with third parties and relevant policy requirements. The inspection covers all third-party institutions and all personal client information processing scenarios in the scope of cooperation. All those efforts are to make sure that third parties use our personal client information according to laws and regulations.

## **VII. Clients' Right to Control Personal Information**

We strictly comply with laws, regulations and supervisory provisions to fully protect clients' right to control their personal information. The scope and provisions for exercising their rights include:

### **i. Right to obtain/access personal information**

Clients have the right to obtain copies of their personal information when accessing their personal information. When clients raise relevant processing requirements concerning their personal information such as viewing and copying their personal information, asking for explanations of information processing rules, etc., we will meet such requirements within the scope permitted by laws and industry specifications, on the basis of ensuring the lawful rights and on the precondition that interests of other institutions and clients will not be infringed.

Clients have the right to access their personal information via our international website, online banking, mobile banking, telephone banking and other channels, unless otherwise specified by laws and regulations.

## **ii. Right to rectify personal information**

Clients can choose to rectify their personal information at outlets. In principle, clients must be present, but regarding contact information such as fixed-line telephone number, contact address, company address, occupation information, nationality and validity of certificates, clients are allowed to authorize others to act on their behalf. Outlets will verify the valid identity documents and relevant evidential materials of the agent and the principal and collect the agent's information, unless otherwise specified by regulatory authorities.

Clients have the right to rectify and update their personal information via our international website, online banking, mobile banking, telephone banking and other channels, unless otherwise specified by laws and regulations.

## **iii. Right to delete personal information**

Clients can request us to delete personal information if:

- The processing of personal information violates any laws or regulations.
- We collect or use personal information without clients' consent or clients have withdrawn consent.
- The processing of personal information goes against the agreement that has been made with clients.
- Clients no longer use our products or services, or close their accounts.
- We no longer provide clients with any product or service, or clients' information storage period has expired.
- The purposes for which we process personal information have been fulfilled, cannot be fulfilled or clients' personal information is no longer necessary to fulfill such purposes.
- We use automatic collection technology, etc. and unavoidably collect unnecessary personal information or personal information without obtaining clients' consent.
- Other circumstances as stipulated by laws and administrative regulations.

If we decide to accept a client's request for deletion, we will also inform the entities that have obtained the client's personal information from us and require them to delete it in time,

unless otherwise specified by laws and regulations, or such entities have obtained the client's separate authorization.

After clients delete information from our services, we may not immediately delete relevant information in the backup system. However, we will delete the information upon backup update.

If the storage period stipulated by laws or administrative regulations has not expired, or if the deletion of clients' information is technically difficult to achieve, we will stop processing clients' information except storing information or taking necessary security protection measures.

#### **iv. Right of portability of client information**

Clients have the right to request us to transfer their information to other processors when that complies with laws and administrative regulations. We will provide clients with their personal information in a format that is easy for subsequent processing and will use security techniques in the transmission process to ensure data security. When it is technically feasible or complies with the regulations stipulated by the national cyberspace administration, we will provide clients with information transfer paths. When assisting clients transferring their information, we will delete data that may infringe others' rights.

#### **v. Right to change the scope of authorization and consent**

We will not refuse to provide products or services for the reason that clients do not consent to our processing of their personal information or withdraw their consent, unless processing of personal information is necessary for provision of products or services. Each business function needs some basic personal information to be completed. Regarding personal information (e.g., location, mobile phone contacts, etc.) that is collected and/or used for enhancing product or service experience, clients can provide or withdraw their authorization or consent at any time by enabling or disabling location service permissions, contact reading permissions, calling permissions, etc. in the mobile phone system settings, depending on the brand and model of mobile phones.

#### **vi. Right to cancel accounts**

If clients are registered users of our products or services, clients can visit an outlet to cancel



accounts through our counter, E-Mobile terminal or self-service equipment, or can choose self-service cancellation through corresponding channels such as mobile banking, online banking, SMS financial services and international websites in accordance with business management regulations.

#### **vii. Right to constrain automatic decision-making of information systems**

In some business functions, we may make decisions only based on artificial automatic decision-making mechanisms including information systems and algorithms. If such decisions significantly affect clients' lawful rights and interests, clients have the right to request an explanation from us, and we will provide appropriate remedies. When adopting automatic decision-making, we follow the principles of fairness and reasonableness. When pushing information or conducting marketing to clients through automatic decision-making, we provide options that do not target clients' personal characteristics or provide individuals with convenient approaches to reject such information or marketing. When a decision that has significant impact on clients' rights and interests is made through automatic decision-making, we will explain it to clients. Clients have the right to reject decisions that are made only through automatic decision-making.

#### **viii. Right to know collection and use of personal information**

Our processing of personal client information is based on client consent, which is made voluntarily and clearly by clients with full knowledge, except in the circumstances where individual consent is not required as stipulated by laws and administrative regulations.

Before providing client information overseas, we will obtain clients' separate consent and perform the security assessment process of the national cyberspace administration.

#### **ix. Responding to clients' above requests**

For security reasons, clients may need to provide a written request or prove identities in other ways. We may ask clients to verify identities before processing requests. We will check and process requests within 15 days after receiving clients' feedback and verifying their identities. Please understand that we may decline requests which are repeated for no reason, require too much of technical intervention, put others' lawful rights and interests at risk or are very unrealistic.

Notwithstanding the foregoing provision, according to laws and regulations, we may not respond to requests under any of the following circumstances:

- The request is related to national security or national defense security.
- The request is related to public safety, public health or major public interests.
- The request is related to criminal investigation, prosecution, trial or enforcement of court order.
- There is adequate proof of the client's subjective malice or abuse of rights.
- Response to the request will seriously impair the lawful rights and interests of the client or of other individuals or organizations.
- Our trade secrets are involved.

#### **VIII. How to Contact Us**

If clients have any queries, opinions or suggestions on this Policy, please call our client service hotline 95533, log in to our official website (WWW.CCB.COM), follow the WeChat official account of "China Construction Bank" or visit our outlets. After receiving clients' query, we will handle it timely and properly. Usually, replies will be given within 15 working days.

Our full name: China Construction Bank Corporation.

Registered address: No. 25, Financial Street, Xicheng District, Beijing, China, 100033.

The Policy is written in simplified Chinese with English version. If there is any difference between the two versions, the simplified Chinese version shall prevail.