The Bank of East Asia, Limited, Macau Branch
東亞銀行有限公司澳門分行

Privacy Policy Statement

September 2025

The Bank of East Asia, Limited, Macau Branch
Data Protection Officer

TABLE OF CONTENTS

Page

1. **INTRODUCTION** 1
2. **KINDS OF PERSONAL DATA HELD BY THE BRANCH** 1
3. **PURPOSES THE PERSONAL DATA IS HELD** 2
4. **SECURITY OF PERSONAL DATA** 5
5. **ACCURACY OF PERSONAL DATA** 6
6. **COLLECTION OF PERSONAL DATA** 6
7. **DATA ACCESS REQUESTS AND DATA CORRECTION REQUESTS** 8
8. **RETENTION OF PERSONAL DATA** 8
9. **OTHER PRACTICES** 8
10. **APPOINTMENT OF DATA PROTECTION OFFICER** 9

1. INTRODUCTION

This Statement is adopted as the Privacy Policy Statement (the "Statement") of The Bank of East Asia, Limited, Macau Branch (the "Branch"). The purpose of this Statement is to establish the policies and practices of the Branch's commitment to protect the privacy of personal data and to act in compliance with the provisions of the Lei da Protecção de Dados Pessoais 個人資料保護法 (Personal Data Protection Act ("PDPA")) of Macau.

2. KINDS OF PERSONAL DATA HELD BY THE BRANCH

2.1 There are two broad categories of personal data held in the Branch. They are personal data related to customers and employees (including former employees)/prospective employees of the Branch.

2.2 Personal data held by the Branch regarding customers may include the following:

a. Name and address, occupation, contact details, date and place of birth, nationality of customers and spouses of customers and their identity card and/or passport numbers and the place and date of issue thereof;

b. current employer, nature of position, annual salary and other benefits of customers and spouses of customers;

c. details of properties, assets and investments held by customers and their spouses;

d. details of other assets and liabilities (actual or contingent) of customers and their spouses;

e. information obtained by the Branch in the ordinary course of the continuation of the banking and other financial relationship (for example, when customers write cheques or deposit money or otherwise carry out transactions as part of the Branch's services, or when customers communicate verbally or in writing with

the Branch, by means of, including but not limited to, documentation, transaction system or telephone recording system, as the case may be);

f. data collected from third parties, including Bank's group companies and third party service providers with whom the customer interacts in connection with the marketing of the Branch's products and services and in connection with the customer's application for the Branch's products and services (including receiving personal data from credit reference agencies approved for participation in the Multiple Credit Reference Agencies Model (including but not limited to the "Plataforma de Dados de Créditos para Caixa Económica Postal" of Macau (澳門「信貸資料平台」), hereinafter referred to as "credit reference agency"));

g. information as to credit standing provided by a referee, credit reference agency or debt collection agency in connection with a request to collect a debt due from any customer to the Branch; and

h. information which is in the public domain.

2.3 Personal data held by the Branch regarding employees (including former employees) and prospective employees may include the following:

a. Name and address, contact details, date and place of birth and nationality of employees and prospective employees and their dependents and their identity card and/or passport numbers and place and date of issue thereof;

b. additional information compiled about prospective employees to assess their suitability for a job in the course of the recruitment and selection process which may include references obtained from their current or former employers or other sources and credit reports obtained from the "credit reference agencies";

c. additional information compiled about employees in the ordinary course of the continuation of the employment relationship which may include records of remuneration and benefits paid to the employees, records of job postings, transfer/secondment and training, records of medical checks and sick leaves, health data, records of outside employment/ appointment and performance appraisal reports of the employees;

d. relevant personal data pertaining to former employees required by the Branch to fulfil its obligations to former employees and its legal obligations under the Lei das Relações de Trabalho 勞動關係法 (Labour Relations Law) of Macau; and

e. information which is in the public domain.

2.4 The Branch may hold other kinds of personal data which it needs in the light of experience and the specific nature of its business.

3. PURPOSES THE PERSONAL DATA IS HELD

3.1 All personal data collected will only be used for purposes which are directly related to the Bank's functions or activities. Personal data collected may be transferred to third

parties when necessary for the same purposes. Individuals concerned would be informed of the possible transferees of their personal data when their personal data is collected.

3.2 It is necessary for customers to supply the Branch with data in connection with the opening or continuation of accounts and the establishment or continuation of banking facilities or provision of banking and other financial services, including handling requests or complaints relating thereto by the Branch.

3.3 It is also the case that data is collected from customers in the ordinary course of the continuation of banking and otherwise financial relationships.

3.4 The purposes for which data relating to customers may be used are as follows:

a. processing considering and assessing the customer's applications for the Branch's products and services which may involve use of automated decision making (ADM) processes;

b. the daily operation of the products, services and credit facilities provided to customers which may involve use of ADM processes and business management of the Bank Group;

c. conducting credit checks on the customer (being borrower or guarantor) at the time of application for credit and at the time of regular or special reviews which normally will take place one or more times each year;

d. creating and maintaining the credit scoring models of the group of The Bank of East Asia, Limited (the "BEA Group");

e. assisting other financial institutions to conduct credit checks and collect debts;

f. ensuring ongoing credit worthiness of customers;

g. designing financial services or related products for customers' use;

h. marketing services, products and other subjects (please see further details in paragraph (6) of the Branch's Personal Information Collection (Customers) Statement);

i. verifying the data or information provided by any other customer or third party;

j. determining the amounts owed to or by customers;

k. enforcing customers' obligations, including but not limited to the collection of amounts outstanding from customers and those providing security for customers' obligations;

l. complying with the obligations, requirements or arrangements for disclosing and using data that apply to the Branch or any branch of the BEA Group or that it is expected to comply according to:

(i) any law binding or applying to it within or outside the Macau Special Administrative Region ("Macau") existing currently and in the future (e.g. "Legal Regime for the Exchange of Tax Information (Law No. 5/2017)" and

its provisions);

(ii) any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside Macau existing currently and in the future (e.g. guidelines or guidance given or issued by the Financial Services Bureau regarding exchange of tax information);

(iii) any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers that is assumed by or imposed on the Branch or any branch of the BEA Group by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations;

m. complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the Branch and the BEA Group and/or any other use of data and information in accordance with any group-wide programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;

n. enabling an actual or proposed assignee of the Branch, or participant or sub-participant of the Branch's rights in respect of the customer to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation; and

o. purposes relating thereto.

3.5 The Branch may, in accordance with the customer's instructions to the Branch or other banks providing services to the customer or third party service providers (including other financial service providers) engaged by the customer, transfer customer's data to such other banks and third party service providers using the Bank's Application Programming Interfaces for the purposes notified to the customer by the Branch, the customer's other banks or third party service providers and/or as consented to by the customer in accordance with the Ordinance.

3.6 The purposes for which data relating to employees (including former employees) and potential employees may be used are as follows:

a. processing employment applications including MRC assessment, where applicable;

b. determining and reviewing salaries, bonuses and other benefits;

c. conducting fit and proper assessment and performance assessment according to internal policy or regulatory requirements or consideration of promotion, training, secondment or transfer;

d. determining any disciplinary or rectifying action arising from employees' conduct or employees' ability to perform their job requirements;

e. consideration of eligibility for and administration of staff loans, medical and other benefits and entitlements, and staff recreation and volunteer activities;

f. providing employee references, with MRC information where applicable;

g. registering employees as intermediaries or licensees with statutory authorities/institutions for purposes directly related or associated to the employment;

h. monitoring the compliance with regulatory requirements and internal governance, policies, procedures, guidelines or rules of the Branch;

i. complying with the obligations, requirements or arrangements for disclosing and using data that apply to the Branch or any of its sub-branches or that it is expected to comply according to:

   (i) any law binding or applying to it within or outside Macau existing currently and in the future; or

   (ii) any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside Macau existing currently and in the future;

j. detecting or conducting investigation regarding any suspicious fraud cases, misconduct (e.g. fake sick leave) or criminal related activities;

k. public health protection, prevention of disease or control of pandemic;

l. assessing the suitability of the employee's continuance in employment; and

m. for human resources management or purposes relating thereto.

4. SECURITY OF PERSONAL DATA

It is the policy of the Branch to ensure an appropriate level of protection for personal data in order to prevent unauthorised or accidental access, processing, erasure, loss or use of that data, commensurate with the sensitivity of the data and the harm that would be caused by occurrence of any of the aforesaid events. It is the practice of the Branch to achieve appropriate levels of security protection by restricting physical access to and processing of data by providing secure storage facilities, and incorporating security measures into equipment in which data is held. Measures are taken to ensure the integrity, prudence, and competence of persons having access to personal data and the access to the personal data is granted on a need-to-know basis only. Personal data is only transmitted by secure means to prevent unauthorised or accidental access. If the Branch engages a data processor including cloud service providers (whether within or outside Macau) to process personal data on the Branch's behalf, the Branch would adopt contractual or other means to prevent unauthorised or accidental access, processing, erasure, loss or use of the data transferred to the data processor for processing.

5. ACCURACY OF PERSONAL DATA

It is the policy of the Branch to ensure that all practicable steps have been taken to maintain the accuracy of all personal data collected and processed by the Branch having regard to the purpose for which the personal data is or is to be used. Appropriate procedures are implemented such that all personal data is regularly checked and updated. In so far as personal data held by the Branch consists of statements of opinion, all reasonably practicable steps are taken to ensure that any facts cited in support of such statements of opinion are correct.

6. COLLECTION OF PERSONAL DATA

6.1 When collecting personal data, the Branch will satisfy itself that the purposes for which the data is collected are lawful and directly related to the Branch's functions or activities. The manner of collection is lawful and fair in the circumstances and the personal data collected is necessary but not excessive for the purposes for which it is collected.

6.2 On or before collecting personal data, the Branch will provide the individuals concerned with a Personal Information Collection Statement ("PICS") informing them of the purpose of collection, classes of persons to whom the data may be transferred, their rights to access and correct the data, and other relevant information. Practicable steps will be taken by the Branch to ensure that the individuals concerned are informed of whether it is obligatory or voluntary for them to supply the data and, if obligatory, the consequences for them if they fail to do so.

6.3 Prior to using any personal data collected by the Branch from public domain, due regards will be given by the Branch to observe the original purposes of making the personal data available in the public domain (such as the purpose of establishing the public register in the enabling legislation). The restrictions, if any, imposed by the original data users of the public domain on further uses and the reasonable expectation of personal data privacy of the individuals concerned will be observed by the Branch.

6.4 In relation to the online collection of personal data, for example, online application for the Bank's product or service or campaign online registration, the Branch will provide the relevant terms and conditions for these products and services and campaigns as well as the applicable PICS on or before the data collection, to inform the individuals concerned of the purpose of collection of personal data, classes of persons to whom the data may be transferred, their rights to access and correct the data and other relevant information(including retention period of the data where applicable).

The Branch will follow strict standards of security and confidentiality to protect any information provided to the Branch online. Encryption technology is employed for sensitive data transmission on the internet to protect individuals' privacy.

6.5 Use of Cookies, Tags, Web Logs etc.

Cookies are small pieces of data transmitted from a web server to a web browser. Cookie data is stored on a local hard drive such that the web server can later read back the cookie data from a web browser. This is useful for allowing a website to maintain information on a particular user.

Cookies are designed to be read only by the website that provides them. Cookies cannot be used to obtain data from a user's hard drive, get a user's email address or gather a user's sensitive information.

The Branch uses cookies, tags and web logs to identify users' web browsers for the following purposes:

a. Session Identifier

The Branch will not store user's sensitive information in cookies. Once a session is established, all the communications will use the cookies to identify a user.

b. Analytical Tracking

Users' visits to the Branch's online platforms and social networks (including but not limited to the Branch's websites, mobile applications and Facebook) will be recorded for analysis and information may be collected through technologies such as cookies, tags, web logs, etc. The information collected is anonymous research data and no personally identifiable information is collected. The Branch mainly collects the information to understand more about our users including user demographics, interests and usage patterns, and to improve the effectiveness of our online marketing.

The information may be transferred to or collected by third parties on our behalf (for example, providers of external service like web traffic tracking and reporting, online advertisement serving) for the above use. The information would not be further transferred to other parties by the third parties engaged by the Branch. The information collected is anonymous research data and no personally identifiable information is collected or shared by the third parties.

Most web browsers are initially set up to accept cookies. Users can choose to "not accept" cookies by changing the settings on the web browsers but this may disable the access to the Branch's internet banking and certain features on the Branch's online platforms and social networks will not work properly. The Branch will retain the collected information for as long as is necessary to fulfill the original or directly related purpose for which it was collected and to satisfy any applicable statutory, regulatory or contractual requirements.

The information collected through technologies such as cookies, tags and web logs etc. will be retained for a period of no longer than 3 years.

6.6 The Branch installs closed circuit television ("CCTV") (with recording mode) systems at branch premises and automated teller machines primarily for general security purposes to protect the safety of customers and the staff, business assets, intellectual property or other proprietary rights. Access to and use of the CCTV records will be granted to authorised personnel only. The Branch may disclose the CCTV records to third parties including regulatory authorities and law enforcement agencies where it is necessary in order for it to respond to any legal processes or to investigate any incidents or complaints, etc.

Subject to the aforesaid, all CCTV records will be erased according to the Branch's policies and guidelines. The security measures that apply to the CCTV records will be consistent with this Statement.

7. DATA ACCESS REQUESTS AND DATA CORRECTION REQUESTS

7.1 It is the policy of the Branch to comply with and process all data access requests ("DARs") and data correction requests ("DCRs") in accordance with the provisions of the PDPA, and for all staff concerned to be familiar with the requirements for assisting individuals to make such requests.

7.2 The Branch may, subject to the PDPA, impose a fee for complying with a DAR. The Branch is only allowed to charge a DAR requestor for the costs which are directly related to and necessary for complying with a DAR. If a person making a DAR requests for an additional copy of the personal data that the Branch has previously supplied pursuant to an earlier DAR, the Branch may charge a fee to cover the full administrative and other costs incurred in supplying that additional copy.

7.3 DARs and DCRs to the Branch may be addressed to the Branch's Data Protection Officer ("DPO") or other person as specifically advised.

8. RETENTION OF PERSONAL DATA

8.1 The Branch takes all practicable steps to ensure that personal data is not kept longer than is necessary for the fulfilment of the purpose for which such data is or is to be used. The Branch usually holds data relating to customer(s) and employee(s) for a period of 7 years or such other period as prescribed by applicable laws and regulations after closure of account, termination of service or cessation of employment.

8.2 Regarding personal data collected from job applicants, unless there is subsisting reason that the Branch is obliged to retain the data for a longer period (such as other period as prescribed by applicable laws and regulations), the Branch may hold the data of unsuccessful applicants for a period up to 2 years from the date of rejecting the applicants.

8.3 If the Branch engages a data processor including cloud service providers (whether within or outside Macau) to process personal data on its behalf, the Branch must adopt contractual or other means to prevent any personal data transferred to the data processor from being kept longer than is necessary for processing the data.

9. OTHER PRACTICES

9.1 The Branch will keep this Statement under regular review.

9.2 The following are maintained by the Branch to ensure compliance with the PDPA:

a. A Log Book recording refusals and reasons of data access/correction requests;

b. Internal policies and guidelines on compliance with the PDPA for observance by staff of the Branch;

c. Data Access Request Form (DP(MO)001) and Data Correction Request Form (DP(MO)002) for individuals' requests for access to and correction of personal data held by the Branch.

10. APPOINTMENT OF DATA PROTECTION OFFICER

10.1 The DPO has been appointed by the Branch to co-ordinate and oversee the compliance with the PDPA and the personal data protection policies of the Branch.

10.2 The contact details of the DPO are as follows:

The Data Protection Officer	Telephone:	(853) 2833 5511
The Bank of East Asia, Limited, Macau Branch	Fax:	(853) 2833 7557
Alameda Dr. Carlos D' Assumpção, No.322	Website:	www.hkbea.com.mo
Fu Tat Fa Yuen, R/C AP to AW, Macau		

(Should there be any discrepancy between the English and Chinese versions, the English version shall prevail.)