



HUA NAN COMMERCIAL BANK LTD.

LONDON BRANCH

HUA NAN CUSTOMER PRIVACY NOTICE

THIS NOTICE

Companies issuing this Notice

Hua Nan Commercial Bank Ltd (London Branch) ("we", "our", "us" or "Hua Nan") is committed to protecting the privacy and security of your personal information. The Notice describes our practices when using personal information in the context of each Customer to whom Hua Nan provides any product or service and/or with whom Hua Nan enters into any transaction. This includes, for example, the personal information of the directors, officers, board members, staff members or shareholders of our corporate Customers.

1 Contact details

Our contact details are as follows:

Post: Hua Nan Commercial Bank Ltd, London Branch, 140 Fenchurch St, London EC3M 6BL
Telephone: Jeffrey Cheah, Compliance Officer 020 7220 0212

How is your personal information collected?

We collect certain personal information in the course of providing our services. We may collect the personal information directly from individuals through communications, applications or other forms, whether we receive these in writing or electronically.

This information can include:

- **Contact information** we use to communicate with Customers, such as details of name, position, current and former addresses (private and professional), telephone number (private and professional), email address;
- **Identity information** we use to identify or authenticate individuals or to meet tax, anti-money laundering (**AML**) and other "Know Your Client" (**KYC**) legal and regulatory obligations, such as details of name, address (private and professional), employer, age/date of birth, nationality,

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Branch registered in
England No. BR004735

Incorporated with public limited liability
in Taiwan Republic of China
Registration: Taipei, 860066
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sex, , photograph, place of birth (city/country), Individual Tax ID, source of wealth and information to assist us to determine whether the individual is a Politically Exposed Person (**PEP**), which may include information about criminal convictions if we are authorised to use this information under applicable law).

- **Communications information** including communications by email, telephone or post in the course of communicating with and providing services to Customers and
- **Relationship information** that helps us to understand more about how to conduct business with Customers, their business requirements, and what types of products and services may interest Customers.

Where we collect personal information from

This Notice applies when we collect individuals' personal information from third parties or when we collect it directly from the individual. We may collect personal information from third party sources, which include the following:

- Other financial institutions and banks who act as syndicate bank, agent bank or in any other capacity in which they act on your behalf in raising funds.
- Our corporate Customers;
- Third party referrals;
- Checking and verification processes such as due diligence checks; and
- Credit reference agencies, insurance information bureaus and government or financial institutions.

We may also collect personal information about individuals from our searches of third party sources such as the press, online publications, corporate registers, sanctions lists and databases of Politically Exposed Persons (**PEP**) for KYC and AML purposes.

How and why we use personal information

We use the personal information we collect for the purposes of:

- Verifying identity, checking transactions for AML purposes, assisting in the prevention of fraud, terrorist financing, bribery and corruption, tax evasion and assisting us to not provide services where individuals may be subject to economic or trade sanctions, on an ongoing basis, in accordance with our policies established to seek to prevent financial criminal activity;
- Fulfilling a transaction or providing a service initiated by a Customer;
- Sending communications by various methods, such as mail, email, telephone, fax and other channels;
- Maintaining and building upon Customer relationships and other business development activities;

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- Maintaining business records of services, payments and other transactions for the legitimate purposes of the business, business planning and database management;
- Event management, including inviting individuals to events;
- Internal analysis and research to help us develop and improve our services to Customers and to better service their accounts;
- Maintenance of our systems, resolving issues and complaints internally as soon as possible to enable us to deliver high standards of service; and
- Compliance with other contractual, legal and regulatory obligations, fraud and theft prevention or investigation, or other risk management purposes.

We justify our processing of personal information on the following legal bases:

- performing a legal obligation to which we are subject, which may include certain legal or regulatory requirements and recording services we provide by telephone;
- performing our obligations under our contracts with Customers;
- performing a task in the public interest, for example where we are carrying out our verification processes in relation to the prevention of any financial crime (including notably fraud, money laundering, terrorist financing, bribery and corruption) and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions;
- pursuing our legitimate interests and those of third parties. A legitimate interest will apply only where we consider that it is not outweighed by an individual's interests or rights which require protection of their personal information.

We have determined that our legitimate interests include the following:

- the improvement and management of Customer services;
- our compliance with our regulatory requirements and improving the overall performance of the business;
- the conduct of internal audits for the legitimate purposes of managing our business;
- obtaining professional (including legal) advice to protect our business and our brand; and
- taking steps to manage our credit, business and other risks as may be required to operate as an effective, efficient and financially prudent financial institution where this is necessary to pursue our legitimate interests in managing and protecting our business.

If an individual requires further information regarding our legitimate interests as applied to their personal information, they may contact us using **Contact details** above.

For limited purposes, such as in the case of certain marketing communications and undertaking AML, KYC and PEP checks and related actions, it may be necessary to process special category information (namely, information about criminal convictions). In these circumstances we will not process any personal information except where you have given us explicit consent or there is an alternative legal basis we can rely on under data protection law. This may also include data about criminal convictions if we are authorised to use this information under applicable local laws.

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In certain circumstances, where an individual does not provide personal information which is required (for example, for us to carry out AML and KYC checks), we will not be able to provide the products and services under our contract with Customers or may not be able to comply with a legal obligation on us. We will make it clear if and when this situation arises and what the consequences of not providing the personal information will be.

Who we share personal information about individuals with

We will disclose personal information of individuals as follows:

- To our Head Office for the purposes as set out in this Notice;
- To credit reference and other third party agencies in order to carry out AML, KYC and PEP checks and comply with legal obligations;
- To third parties who have introduced Customers to us, such as financial service providers in order to process the data for the purposes as set out in this Notice;
- To third parties who work on our behalf or for the Customer to service or maintain Customer accounts, such as administrators and managers including those external to Hua Nan;
- To third parties who provide technical services to process transactions, such as suppliers of banking applications and other IT systems, and print services, which we use to process that personal information;
- To third parties providing services to us such as our professional advisers (e.g. auditors and lawyers) and IT suppliers;
- To a party representing a Customer (for example, in response to legal process); and
- To competent authorities such as tax authorities, courts, regulators and security or police authorities where required or requested by law or where we consider it necessary.

Where we will hold personal information

We may transfer and maintain the personal information of individuals covered by this Notice on servers or databases outside the European Economic Area (**EEA**), in particular to Hua Nan's Head Office. We may be required to send to our Head Office in Taiwan the names of directors, officers, board members, staff members or shareholders of both our and Head Office's customers for screening checks. In most cases, the specific country **outside the EEA** to which we send individuals' information is Taiwan.

These countries may not have the equivalent level of data protection laws as those in your location. If we need to transfer personal information outside the EEA, we will take steps to make sure your personal information is protected and safeguarded once it leaves the EEA, in particular, the use of Model Clauses approved by the European Commission and permitted under Article 46 of the GDPR. If you would like to obtain the details of such safeguards, you can request these using **Contact details** above.

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How long we will store personal information for

We will retain the personal information of individuals covered by this Notice for as long as required to perform the purposes for which the information was collected, depending on the legal basis on which that data was obtained and/or whether additional legal/regulatory obligations mandate that we retain the personal information. In general terms, this will mean that personal information will be kept for the duration of our relationship with the individual and:

- the period required by tax, company and financial services laws and regulations; and/or
- as long as it is necessary for individuals to be able to bring a claim against us and for us to be able to defend ourselves against any legal claims. This will generally be the length of the relationship plus the length of any applicable statutory limitation period under applicable law.

In the majority of cases, this will be during our relationship with the individual and then for five years after the end of the relationship with the individual.

In certain circumstances, personal information may need to be retained for a longer period of time: for example, where we are in ongoing correspondence or there is a continuing claim or investigation.

What an individual's rights are in relation to the personal information.

An individual will have certain rights in relation to their personal information. Some of these rights will only apply in certain circumstances. If an individual would like to exercise, or discuss, any of these rights, they should submit their request in writing or email using the details at **Contact details** above and provide sufficient information to allow us to understand the scope of the request.

- **Consent:** If our processing is based on consent, an individual can withdraw their consent at any time by contacting us.
- **Access:** An individual is entitled to ask us if we are processing their personal information and, if we are, they can request access to their personal information. This enables them to receive a copy of the personal information we hold about them and certain other information about it.
- **Correction:** An individual is entitled to request that any incomplete or inaccurate personal information we hold about them is corrected.
- **Erasure:** An individual is entitled to ask us to delete or remove personal information in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal information is required for compliance with law or in connection with claims.
- **Restriction:** An individual is entitled to ask us to suspend the processing of their personal information, for example if they want us to establish its accuracy or the reason for processing it.
- **Transfer:** An individual is entitled to request the transfer of their personal information to another third party in limited circumstances.
- **Objection:** Where we are processing personal information based on legitimate interests (or those of a third party) an individual may challenge this. However we may be entitled to continue

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processing personal information based on our compelling legitimate interests or where this is relevant to legal claims. An individual also has the right to object where we are processing personal information for direct marketing purposes.

- **Supervisory Authority:** An individual also has a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where they are habitually resident, where they work or where an alleged infringement of data protection law has taken place. In the UK, this is the [Information Commissioner's Office](#).

Changes to this Notice

From time to time, we may change and/or update this Notice. If this Notice changes in any way, we will send you an updated version.

If we change anything important about this policy (the personal information we collect, how we use it or why) we will highlight those changes when we send you the updated version. Changes to this Notice will go into effect when they are made.

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