HL Bank

PRIVACY POLICY

HL BANK PRIVACY POLICY ('this Policy')

1. Personal Data Confidentiality

1.1 HL Bank ('the Bank') strives to protect the confidentiality of the personal data of individuals that has been provided to the Bank. This Policy is accordingly addressed to you as an individual in the jurisdiction of Singapore.

1.2 This Policy is developed to assist you in understanding how we collect, disclose, transfer and store your personal data and how we intend to deliver the rights and protection that you are entitled to under the Personal Data Protection Act 2012 ('the PDPA') which strives to protect personal data of individuals.

1.3 Ensuring the security of your personal information is our priority. We strive to protect the confidentiality of this information by maintaining appropriate physical, electronic, and procedural safeguards. We invest in systems and infrastructure to minimize any risks of compromising data security. Each of our employees is also bound by our Code of Conduct and Ethics which requires them to maintain customer confidentiality.

1.4 When we use other companies to provide services to our customers on our behalf ('service providers'), we also require them to protect the confidentiality of your personal data that they may receive.

1.5 In relation to Clause 1.4 above and Clause 4.2 below, please understand that we will only share your information with our service providers and business partners in accordance with this Policy.

2. Choice to Supply Personal Data

2.1 As an individual, you are provided opportunities to make choices. We encourage you to make choices that enable us to provide you with quality products and services that help you to meet your financial needs and objectives.

2.2 The collection of your personal data by the Bank may be mandatory or voluntary/optional in nature in order to establish or continue to enjoy the Bank's financial services and/or establish any other business relationships with the Bank.

2.3 It is necessary for you to provide data which are mandatory. If you choose not to supply such data, this may result in the Bank being unable to provide products and/or services or otherwise deal with you.

2.4 We endeavour to keep you informed of the latest marketing and promotional offers that we feel would be useful and beneficial to you. These may include programs you may find valuable in helping you manage your account; such as product or service upgrades, credit/financing line increases and other benefits.

2.5 However, you can choose not to receive these marketing and promotional offers. You can do so by informing the Bank in writing. Your request will be processed and no fees will be charged.

3. Collection of Personal Data

3.1 "Personal data" is defined in the PDPA as any data or information about you from which you can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access to.

3.2 The types of personal data collected may vary according to the business relationship that is established. Data collected may include the following:

- Data collected on applications or other forms or as provided by you, such as name, identity card number or passport number (for foreigners), address, e-mail address, telephone number,

occupation, financial position such as assets and income, investment objectives, employer's details, family members and personal information about them and such other information as may be relevant for your application;

- Data about your transactions with the Bank, its service providers, business partners or third parties, such as account balances, payment history, and account activity;
- Data from credit bureau reports;
- Data from credit reporting agencies;
- Data from governmental agencies, regulatory and statutory authorities;
- Data from your joint account holder(s) and/or parties providing security for your facilities;
- Data obtained from your access to the Bank's web server, for example, by the use of cookies, i.e. small text files, sent by the Bank's server to your system when you access the Bank's server;
- Data for insurance/takaful products; and
- Data from publicly available sources.

4. Use of Personal Data

4.1 The Bank collects your personal data for the provision of financial services or products requested by you in order to meet your financial needs and objectives.

4.2 In addition to the above, the Bank may also make arrangements with business partners to jointly develop products and services or launch marketing campaigns that may involve the sharing of your personal data.

4.3 Your personal data may be used or processed by the Bank or the Bank's service providers for the following purposes:-

- To establish a relationship between you and the Bank and/or the Bank's head office, companies related to or affiliated to the Bank, the Bank's service providers and business partners;
- To process applications for products and services;
- To evaluate and monitor credit/financing worthiness;
- For evaluation and due diligence purposes;
- For the provision of products and services to you, whether through face-to-face banking or through electronic means, including processing of receipts and payments, automatic teller machine services and credit and charge cards;
- For data processing purposes;
- To evaluate and monitor provision of services;
- To respond to inquiries from you;
- To understand your needs and offering products and services to meet those needs;
- For the research and development of products and services for your use;

- To allow the Bank, the Bank's related and/or affiliated companies, service providers and business partners to promote their products and services;

- For debt collection purposes;

- For enforcement of our rights and obligations of other parties to us and/or our affiliates;
- For assessing, processing and investigating insurance/takaful risks and claims;
- For deposit insurance purposes;
- To enable a party to evaluate any actual or proposed assignment, participation, sub-participation and/or novation of our rights and/or obligations;
- To meet legal and regulatory requirements, which may include disclosure, notification and record retention requirements;
- To maintain and protect our offices and automatic teller machines;
- For audit and risk management;
- For any transfer or proposed transfer of any part of the Bank's interests, obligations, business and/or operations;
- For such other purposes as permitted by applicable law or with your consent;
- For preventing, detecting and investigating crime, including fraud and any form of financial crime, and analysing and managing other commercial risks;
- To comply with any applicable local or foreign statute, rule, law, regulation, judgment, decree, directive, code of practice, guideline, administrative requirement, sanctions regime, court order, agreement between the Bank and any governmental and/or regulatory and/or industry related association / authority, international guidance and internal policies or procedures, or to assist in or with law enforcement and investigations by any governmental and/or regulatory and/or industry related association / authority or to comply with any request from any such association / authority; and
- For all other purposes incidental and associated with any of the above.

4.4 You should ensure that all personal data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with products and services you have requested.

4.5 Where personal data is submitted by you on behalf of another individual or concerns another individual other than yourself (or, in the case of situations where you, as a representative of your company or organisation, are submitting the personal data of individuals as part of the disclosures by the company or organisation to us), you represent and warrant to us that all the necessary consents (procured in accordance with all applicable data protection legislation, including without limitation the PDPA, for such purposes stated in the relevant sections of this Policy) have been obtained from the relevant individuals and that you have retained proof of these consents, such proof to be provided to us upon our request.

5. Disclosure of Personal Data

5.1 For the purposes above, your personal data may be provided by the Bank to :-

- Any person under a duty of confidentiality to the Bank or to companies related to or affiliated with the Bank;

- The Bank's head office or any branch thereof or companies related to or affiliated to the Bank (whether such company operates in Singapore or elsewhere);

- Any financial institution granting or intending to grant any credit/financing facilities to you, any credit bureau established in Singapore, authorities/agencies established by the Monetary Authority of Singapore and/or any other person as may be authorised by law or any governmental and/or regulatory and/or industry related association / authority (whether based in Singapore or otherwise);

- Any relevant agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment, securities clearing, management, audit or other services to the Bank;

- Any banking, financial or other institution with which you have or propose to have dealings with;

- Any credit reference agency or debt collection agencies;

- Lawyers, auditors, tax advisors, investment banks and other professional advisors which is restricted to the nature of the business relationship in which you are involved in with the Bank;

- Any insurance company/takaful operators and any association or federation of insurance companies/takaful operators;

- Any person or corporation to whom the Bank transfers or proposes to transfer any part of its interests, obligations, business and/or operations;

- Any nominee, trustee, co-trustee, centralised securities depository or registrar, custodian, estate agent, solicitor or other person who is involved with the provision of services or products by the Bank to you;

- Any person by whom the Bank is required by applicable legal, governmental or regulatory requirements to make disclosure; or

- Any other person reasonably requiring the same in order for the Bank to carry out the activities set out in the above purposes.

6. Right to Access and Correct Personal Data

6.1 You are entitled to ask whether the Bank holds data on you and to request access to and the correction of any such data held. You will be required to fill up a form and a reasonable administrative fee may be charged for processing each data access request.

If you wish to make any request for access to, or to correct data held by the Bank, please forward your request to the following address or telephone number and we will facilitate the fulfillment of your request as soon as possible :

The Data Protection Officer
HL Bank
1 Wallich Street
#29-01 Guoco Tower
Singapore 078881

Telephone : (65) 6349-8338
Fax : (65) 6533-9340

7. Amendments to the Privacy Policy

7.1 This Policy may be reviewed and amended from time to time. We will communicate such changes along with the updated policy on the Bank's website (www.hlbank.com.sg), and/or other appropriate communication means as may be determined by the Bank.