Commonwealth Bank of Australia Limited
ABN 48 123 123 124
AFSL 234945
Incorporated in Australia with Limited Liability

Hong Kong Branch External Privacy Policy

1. About us

The Commonwealth Bank of Australia and its subsidiaries ("**CBA**" or "the **Group**") provide banking, finance insurance, funds management, financial planning and advice, superannuation, stockbroking and other services. The Group includes the Commonwealth Bank of Australia, Hong Kong Branch ("the **Branch**").

The Branch must follow the Hong Kong (Cap. 486) Personal Data (Privacy) Ordinance ("**PDPO**"), including the six Data Protection Principles and the relevant Codes and Guidance set out by the Office of the Privacy Commissioner for Personal Data ("**PCPD**"), upon which this policy is based, as well as the Australian Privacy Act and the Australian Privacy Principles.

In this policy, "**we**", "**us**" or "**our**" refers to the Branch. In this policy, "**you**" and "**your**" refers to customers, beneficial owners and relevant personnel of customers of the Branch, employees of the Branch and suppliers directly contracted by the Branch.

In addition to the Hong Kong and Australian privacy regulations, individuals located in the European Economic Area ("**EEA**") and the United Kingdom ("**UK**") may also have rights under European Union (EU) based rules known as the General Data Protection Regulation ("**GDPR**") and UK General Data Protection Regulation ("**UK GDPR"**). The GDPR and UK GDPR give more rights to individuals located in the EEA and UK and more obligations to organisations holding their personal information.
Additional rights of individuals located in the EEA and UK, and how the Group meets them, are outlined in the CBA Group Privacy Policy, which can be found at:
https://www.commbank.com.au/support/privacy.html

2. Your privacy is important to us

We know that how we collect, use, exchange and protect your information is important to you, and we value your trust. That is why we protect your information and aim to be clear about what we do with it.

This Policy explains how we handle your personal information. It also includes our policy on the handling of credit reports and other credit related information.

Please note that during the course of our relationship with you, we may tell you more about how we handle your information. This could be when you complete an application or claims form, or receive terms and conditions or a Product Disclosure Statement. When you receive this further information, please consider it carefully.

Any updates to this policy will be published under the 'Hong Kong' section of the CBA Asia website, which can be found here:
https://www.commbank.com.au/about-us/our-company/international-branches/asia.html

3. What information do we collect?

Information we collect from you

We collect information about you and your interactions with us, for example, when you request or use our products or services, transfer money, or phone us. The information we collect from you may include:

- Information about your identity – including your name, address, date of birth, gender and marital status
- Your Hong Kong ID Card Number, travel document number and other tax residency information
- Financial and transaction information
- Health or medical information
- Other personal information – including details or your interactions with us

Information we collect from others

We collect information about you from others, such as:

- Service providers
- Agents
- Brokers
- Employers
- Outside business interests – for example a company in which you have a material interest or a directorship
- Connected parties – for example family member or shareholders

We may also collect information about you that is publicly available, for example from public registers or social media, or made available by third parties.

Cookies and online tracking

We use cookies on our websites or applications. Cookies are small files stored on a computer that are designed to hold small amounts of data specific to a user and the websites or applications to help tailor that user's experience. You can find more information from our website's Cookies section here:
https://www.commbank.com.au/important-info/cookies.html?ei=CB-footer_cookies

4. How do we use your information?

We collect, use and exchange your information so that we can:

- Confirm your identity
- Assess applications for products and services
- Design, manage, price and provide our products and services
- Manage our relationship with you
- Manage our risks and help identify or investigate fraud and other illegal activity
- Contact you, for example when we need to tell you something important
- Improve our service to you and your experience with us
- Comply with laws and regulations, and assist government, law enforcement agencies and regulators
- Manage our business

Bringing you new products and services

From time to time, we may also use your information to tell you about products and services we think you might be interested in. To do this, we may contact you by:

- Email
- Phone
- SMS
- Mail

If you do not want to receive direct marketing messages or want to change your contact preference, please contact your Relationship Manager or call us on +852 2844 7500 and ask for the Data Privacy Officer.

5. Who do we share your information with?

We may share your information with other members of the Group, so that the Group may adopt an integrated approach to its customers. Group members may use this information for any of the purposes mentioned in Section 4.

We may also share your information with third parties for the reasons outlined in Section 4 or where permitted by law. These third parties can include:

- Service providers – for example credit reporting bodies
- Businesses who do some of our work for us – including information technology support and archive file storage
- Brokers, agents and advisers, and people acting on your behalf – for example guardians, persons holding power of attorney and any person appointed to legally manage your affairs
- Guarantors and other security providers
- People involved in arrangements that provide funding to us including persons who may acquire rights to our assets (for example loans), investors, advisers, trustees and rating agencies
- People who help us process claims – like assessors and investigators
- Other banks and financial institutions – for example, if we need to process a claim for mistaken payment
- Auditors, insurers and reinsurers
- Current or previous employers
- Government and law enforcement agencies or regulators
- Credit reporting bodies and credit providers
- Actual or proposed assignee of the Branch, or participant or sub-participant of the Branch's rights in respect of the customer – for example to evaluate a transaction intended to be the subject of the assignment, participation or sub-participation
- Organisations that help identify illegal activities and prevent fraud

Sending information overseas

From time to time, we may send your information overseas, including to:

- Overseas business that are part of the Group and
- Service providers or other third parties who operate or store data outside Hong Kong

We may also send information overseas to:

- Complete a transaction, such as an International Money Transfer or
- Comply with laws, and assist government or law enforcement agencies

Where we do this, we make sure that there are arrangements in place to protect your information. For more information about which countries your information may be sent to, please call us on +852 2844 7500 and ask for the Data Privacy Officer.

Please note your personal information may also be subject to applicable local laws in jurisdictions outside of Hong Kong, and these may be different from the laws of Hong Kong.

6. Keeping your information safe

We aim to only keep your information for as long as we need it. We store your hard copy and electronic records in our secure buildings and systems, or offsite using trusted third parties. We may store your data locally or overseas, including in the cloud. Our security safeguards include:

Staff Education	We train and remind our staff about how to keep your information safe and secure.
Taking precautions with overseas transfers and third parties	When we send information overseas or use third parties that handle or store data, we put arrangements in place to protect your information.
System Security	We have firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from accessing our systems. When we send your electronic data outside the Group, we use dedicated secure networks or encryption. We use passwords and/or smartcards to stop unauthorised people getting access.
Building security	We use a mix of alarms, cameras, guards and other controls in our buildings to prevent unauthorised access.
Destroying or de-identifying data when no longer required	Where practical, we aim to keep information only for as long as required to fulfil the purpose for which the data was collected, to meet our legal and regulatory requirements or our internal needs. Personal Data, which is no longer required, will be securely destroyed or de-identified.

7. Accessing, updating and correcting your information

Can I get access to my information?

You can ask for a copy of your information, such as your transaction history, by contacting your Relationship Manager.

For more detailed information, such as details recorded in your loan file, please complete and sign the 'Personal Data (Privacy) Ordinance Data Access Request Form' (Form OPS003)[1] and send it to the following address:

Commonwealth Bank of Australia, Hong Kong Branch
ATTN: Data Privacy Officer
Suite 1401, One Exchange Square
8 Connaught Place
Central, Hong Kong

Is there a fee?

There is no fee for making an initial request, but in some cases there may be an access charge to cover the time we spend locating, compiling and explaining the information you request. If there is an access charge, we will give you an estimate up front and confirm that you would like us to proceed. Generally, the access charge is based on an hourly rate plus any photocopying costs or other out-of-pocket expenses. You will need to make the payment before we start.

[1] Form OPS003 can be found under the 'Resources Centre' section of the Privacy Commissioner for Personal Data, Hong Kong website https://www.pcpd.org.hk/

How long does it take?

We aim to make your information available within 40 days of your request. If we cannot meet this timeframe, we will take reasonable steps to notify you in writing. Before we give you the information, we will need to confirm your identity.

Can you deny or limit my request for access?

In certain circumstances, we are allowed to deny your request or limit the information we provide to you. For example, where we are unable to comply with your request without disclosing the personal data of another party that has not given their consent. If we do this, we will write to you explaining our decision.

Updating your basic information

It is important that we have your correct details, such as your current address and telephone number. You can check or update your information by contacting your Relationship Manager, or phoning +852 2844 7500 during business hours (9.00am to 5.00pm, Monday to Friday except public holidays).

If you become aware that any information you have given to us has changed, is no longer correct or is misleading, please notify us within 30 calendar days and we will help you to correct it.

Can I correct my information?

You can ask us to correct any inaccurate information we hold or have provided to others by contacting your Relationship Manager, or phoning +852 2844 7500 during business hours (9.00am to 5.00pm, Monday to Friday except public holidays). If the information that is corrected is information we have provided to others in the previous 12 months, you can ask us to notify them of the correction. We do not charge a fee for these requests.

We aim to correct information within 40 days. If we cannot meet this timeframe, we will take reasonable steps to notify you in writing of the reason for the delay and try to agree a timeframe with you to extend the period.

If we are able to correct your information, we will inform you when the process is complete.

What if we believe the information is correct?

If we disagree with you and do not think the information needs correcting, we will let you know why in writing. You can ask us to include a statement with the relevant information, indicating your view that the information is inaccurate, misleading, incomplete, irrelevant or out-of-date. We will take reasonable steps to comply with such a request.

8. Making a privacy complaint

We are here to help

We try our best to get things right the first time but we accept that sometimes we can get things wrong. If you have a concern about your personal data, you have the right to make a complaint and we will do everything we can to put matters right.

How do I make a complaint?

To lodge a complaint, please get in touch with your Relationship Manager. If you have raised the matter through your Relationship Manager and it has not been resolved to your satisfaction, please contact the Branch on +852 2844 7500 and ask to speak with the Branch Complaints Officer. More information on complaints can be found under the 'Hong Kong' section of the CBA Asia website:
https://www.commbank.com.au/about-us/our-company/international-branches/asia.html

How do we manage a complaint?

We will:

- Acknowledge your complaint with a few days of receipt
- Keep a record of your complaint
- Provide you with a reference number, along with the name or job title and contact details of the staff member handling the complaint if you wish to follow it up
- Keep you updated on progress as we work towards fixing the problem

The Branch will generally aim to resolve the complaint within 30 calendar days of receipt of your complaint. However, if we are unable to provide a final response within 30 calendar days, we will contact you to explain why and discuss a timeframe to resolve the complaint. We will provide a final response to all complaints within 60 calendar days. If we are unable to provide a final response within 60 calendar days under very special circumstances, we will contact you to explain why and discuss a timeframe to resolve the complaint.

What else can you do?

If you are not satisfied with how we manage your complaint, or our decision, you can refer your complaint to an external dispute resolution body. We suggest you do this only once you have first followed our internal complaint processes set out above.

The Financial Dispute Resolution Centre ("**FDRC**") is an independent and impartial organisation administering the Financial Dispute Resolution Scheme ("**FDRS**") which requires financial institutions, as members of the FDRS, to resolve monetary disputes with their customers through mediation and/or arbitration. For further details on the Dispute Resolution Process offered by the FDRC, please visit the following website:
https://www.fdrc.org.hk/en/html/resolvingdisputes/resolvingdisputes_fdrsprocess.php or contact the FDRC on +852 3199 5100 or fdrc@fdrc.org.hk.

The Hong Kong Monetary Authority ("**HKMA**") supervises banks in Hong Kong and offers a mechanism for consumers to lodge a dispute with them. For more information on how to lodge a complaint with the HKMA, please visit the following website:
www.hkma.gov.hk/eng/key-functions/banking-stability/complaints-about-banks.shtml

If your complaint is about the way we handle your personal information, you may also contact the PCPD. For more information on lodging a complaint to the PCPD, please visit the following website: www.pcpd.org.hk/english/complaints/introduction/introduction.html