

KEB Hana Bank Data Protection Policy

We at KEB Hana Bank (Singapore Branch) (the “**Bank**”) recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Data Protection Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any personal data.

This Data Protection Policy supplements but does not supersede nor replace any other consents which you may have previously provided to us nor does it affect any rights that we may have at law in connection with the collection, use and/or disclosure of your Personal Data. We may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. If any material revision is made to this Data Protection Policy, updates will be published at <https://global.1qbank.com>. Subject to your rights at law, the prevailing terms of the Data Protection Policy shall apply. For the avoidance of doubt, this Data Protection Policy forms a part of the General Commercial Agreement governing your relationship with us and should be read in conjunction with such General Commercial Agreement (“General Commercial Agreement”). In the event of any conflict or inconsistency between the provisions of this Data Protection Policy and the General Commercial Agreement, the provisions of the General Commercial Agreement shall prevail.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the “**DPO**”) at: mei@hanafn.com

1 INTRODUCTION

- 1.1 “Personal Data” is defined under the Personal Data Protection Act 2012 (“**PDPA**”) to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organization has or is likely to have access. Common examples of personal data include names, identification numbers, contact information, medical records, photographs, video images, information regarding transaction and information regarding financial condition.
- 1.2 We collect personal data in accordance with the PDPA. We will notify you of the purposes for which your personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless an exception under the law permits us to collect and process your personal data without your consent, or we collect your personal data from our customer or another party who has provided us with appropriate assurances that your consent has been sought and obtained.

2 PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

- 2.1 We collect, use and disclose personal data of our customers and of other individuals connected to our customers (such as their guarantors, family members, employees, executives, directors, shareholders, and/or partners) (each a “**Relevant Individual**”) for the following purposes:
 - (a) processing applications for any of the products or services offered or distributed by us;

- (b) evaluating your or a Relevant Individual(s)' credit and eligibility profile (including but not limited to you or a Relevant Individual(s)' assets) from time to time;
- (c) providing the products and services applied for by you or our customer, whether such products and services are provided by the Bank or external providers through the Bank, including administering and/or managing relationships with customers and customer account(s) with the Bank;
- (d) performing bank account verification services for paying organizations;
- (e) generating financial, regulatory, management or other related reports and performance of analytics;
- (f) preventing, detecting and investigating crime, offences or breaches including fraud, money-laundering, counter terrorist financing and bribery;
- (g) meeting or complying with the Bank's internal policies and procedures;
- (h) legal purposes (including but not limited to enforcing our legal rights, drafting and reviewing documents, obtaining legal advice and facilitating dispute resolution);
- (i) handling customer feedback or complaints;
- (j) maintaining the security of the Bank premises (including but not limited to the use of closed-circuit television (CCTV) systems, which may capture your image when you are on the Bank premises);
- (k) facilitating proposed or actual assignment, transfer, participation or sub-participation in any of our rights or obligations in respect of your relationship with us; and purposes which are reasonably related to the aforesaid.
- (l) conducting credit checks and ensuring your ongoing creditworthiness, and the collection of amounts outstanding from you and any person providing security or guarantees for your obligations;
- (m) compliance 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 an Authority (as defined below), agreement or treaty between Authorities, international guidance and internal policies or procedures, which may apply to the Bank or which any such company is subject to, or to assist in or with law enforcement and investigations by any Authority or to comply with any request from an Authority. For the purposes of this Data Protection Policy, Authority refers to any judicial, administrative or regulatory body, any government or public or government agency, instrumentality or authority, any domestic or foreign tax, revenue, fiscal or monetary authority or agency, securities or futures exchange, self-regulatory organization, trade repositories, central counterparties, court, central bank or law enforcement body or any agents thereof, having jurisdiction over the Bank.

(collectively, the "**Purposes**")

These purposes may also apply even if you do not maintain any account(s) with us, or have terminated these account(s).

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. 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 Data Protection 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.

As the purposes for which we may/will collect, use, disclose or process your personal data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or other law, or we collect your personal data from our customer or another party who has provided us with appropriate assurances that your consent has been sought and obtained.

- 2.2 In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third party service providers and/or sub-contractors, agents and/or our affiliates or related corporations, and/or other third parties whether sited in Singapore or outside of Singapore, for one or more of the above-stated Purposes. Such third party service providers and/or sub-contractors, agents and/or affiliates or related corporations and/or other third parties, would be processing your personal data either on our behalf or otherwise, for one or more of the above-stated Purposes.
- 2.3 You hereby acknowledge, consent to and agree that personal data you provide to us from time to time (including personal data of your Relevant Individual(s)) may be collected, use and disclosed by the Bank for the Purposes, including by disclosure to the following third parties (whether located within or outside Singapore) for one or more of the above Purposes, and for the said third parties to subsequently process your personal data for one or more of the above Purposes, on your own behalf and on behalf of each Relevant Individual:
- (a) the Bank's Group Companies (including related corporations and subsidiaries of Hana Financial Group) and between each of them;
 - (b) to the Bank's (or the Bank's Group Companies') third party service providers and/or sub-contractors or agents including but not limited to those who provides administrative, telecommunications, computer, payment or securities clearing or other services to the Bank in connection with the operation of its business, mailing houses, telecommunication companies, marketing agents, call centres, data processing companies and information technology companies;
 - (c) any valuer, credit reference agency, rating agency, business partner, insurer provider or insurance broker, direct or indirect provider of credit protection, card association, bank or financial institution, and, in the event of default, to debt collection agencies;
 - (d) any fund management companies, private equity companies and managers, other financial companies (e.g. for structuring / provision of services), external asset managers, service providers (e.g. alternative investment service providers) and financial service providers;
 - (e) any external services or products provider that is providing services or products through the Bank;
 - (f) any credit bureau and/or its compliance committee and for such credit bureau and/or its compliance committee to disclose the personal information to third party or parties and/or sub-contractors, including but not limited to its member banks or financial institutions;
 - (g) to the Bank's auditors and professional advisors including its solicitors;
 - (h) any person to whom the Bank is under an obligation to make disclosure under the requirements of any law binding on the Bank or any of the Bank's Group Companies or under and for the purposes of any guidelines issued by regulatory or other authorities with which the Bank or any of the Bank's Group Companies are expected to comply with;
 - (i) any person to whom disclosure is permitted or required by any statutory provision or law;

- (j) any permitted assigns;
- (k) the Bank's successors in title; and
- (l) to any local or foreign regulatory body, government agency, statutory board, ministry, departments or other government bodies and/or its officials.

You further warrant that you have obtained the consent of the Relevant Individuals for all such collection, use and disclosure of their personal data as you have provided to us, and have their authority to provide consent on their behalf as set out in this paragraph 2.

2.4 Any collection, use or disclosure pursuant to the consents obtained in this paragraph 2 are in addition to and without prejudice to the Bank's other rights of disclosure available under law, including those rights of disclosure available pursuant to the Banking Act (Cap. 19) of Singapore (as may be amended or revised from time to time), and nothing in this Data Protection Policy is to be construed as limiting any of these other rights.

3 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

3.1 We respect the confidentiality of the personal data you have provided to us.

3.2 In that regard, we will not disclose your personal data to third parties without first obtaining your consent permitting us to do so, such as your consent as provided through or obtained pursuant to paragraph 2 above. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:

- (a) cases in which the disclosure is required or authorised based on the applicable laws and/or regulations;
- (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
- (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of you or another individual;
- (d) cases in which the disclosure is necessary for any investigation or proceedings;
- (e) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
- (f) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or
- (g) where such disclosure without your consent is permitted by the PDPA or by law.

3.3 The instances listed above at paragraph 3.2 are not intended to be exhaustive. For more information on the exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA which is publicly available at <http://statutes.agc.gov.sg>.

3.4 Where we disclose your personal data to third parties with your consent, we will employ our best efforts to require such third parties to protect your personal data to a reasonable standard.

4 REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

- 4.1 You may request to access and/or correct the personal data currently in our possession by submitting your request at the bank. For a request to access personal data, we will provide you with the relevant personal data within 30 business days from such a request being made. If the bank is unable to respond to an access or correction request within 30 business days from the time the request is made, the bank shall within that time inform the individual in writing of the time by which it will respond to the request (which should be the soonest possible time it can provide access or make the correction).
- 4.2 For a request to correct personal data, we will:
- (a) correct your personal data as soon as practicable after the request has been made unless we have reasonable grounds not to do so; and
 - (b) subject to paragraph 4.4, we will send the corrected personal data to every other organisation to which the personal data was disclosed by us within a year before the date the correction was made, unless that other organization does not need the corrected personal data for any legal or business purpose.
- 4.3 Notwithstanding paragraph 4.2(b), we may, if you so consent, send the corrected personal data only to specific organizations to which the personal data was disclosed by us within a year before the date the correction was made.
- 4.4 We will also be charging you a reasonable fee for the handling and processing of your requests to access your personal data. We will provide you with a written estimate of the fee we will be charging. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

5 REQUEST TO WITHDRAW CONSENT

- 5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by emailing your request to mei@hanafn.com, Attention to the "Data Protection Officer".
- 5.2 We will process your request from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.
- 5.3 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your existing relationship with us, or where you are not our customer, it may affect the relationship between us and the customer who provided your personal data to us.

6 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

- 6.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by the bank to make a decision that affects you, or disclosed to another organisation. However, this means that you must also update us of any changes in personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your failure to update us of any changes in personal data that you had initially provided us with.

- 6.2 We will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorised use of your personal data by third parties which are wholly attributable to factors beyond our control.
- 6.3 We retain personal data in accordance with our legal, regulatory, business and operational obligations and requirements.
- 6.4 Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so.

7 COMPLAINT PROCESS

7.1 If you have any complaint regarding about how we are handling your personal data or about how we are complying with the PDPA, please contact us with your complaint.

7.2 Please contact us at the below:

(a) Singapore telephone number : +65 6536 1633

(b) E-mail : mei@hanafn.com

Attention it to the 'Data Protection Officer'

(c) Office address : KEB Hana Bank

30 Cecil Street

#24-03/08, Prudential Tower

Singapore 049712

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