

## **Data Protection Policy (Employees and Prospective Employees) - Singapore**

Your privacy is important to us. This Data Protection Policy outlines how your Personal Data will be managed in accordance with the Personal Data Protection Act ("PDPA") which strives to protect personal data of individuals. Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we may collect, use and/or disclose your Personal Data.

You agree and consent to The Hongkong and Shanghai Banking Corporation Limited, Singapore Branch and our group companies (collectively referred to herein as "HSBC", "us", "we" or "our") as well as our respective agents, authorised service providers and relevant third parties collecting, using, disclosing and/or sharing your Personal Data in the manner set forth in this Data Protection Policy. In this Data Protection Policy, "group companies" refers to HSBC Holdings plc and/or any of its affiliates, subsidiaries, associated entities and any of their branches and offices, such as HSBC Insurance (Singapore) Pte Limited, HSBC Global Asset Management (Singapore) Limited, HSBC Trustee (Singapore) Limited, HSBC Institutional Trust Services (Singapore) Limited, HSBC International Trustee Limited, Singapore Branch and Hang Seng Bank Limited, Singapore Branch.

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. Please note that this Data Protection Policy outlines how your Personal Data will be managed in connection with your employment or prospective employment with HSBC only. The management of any Personal Data which you may provide as a customer of HSBC is outlined in a separate policy document. 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. As and when the contents of this Data Protection Policy are updated or amended, the changes will be uploaded onto our intranet / website [https://bank.hangseng.com/1/PA\\_1\\_2\\_S5/content/pws/common/pdfs/staff\\_pdpa\\_sg\\_e.pdf](https://bank.hangseng.com/1/PA_1_2_S5/content/pws/common/pdfs/staff_pdpa_sg_e.pdf). It is your duty to keep yourself updated as to the latest version of the Data Protection Policy.

For the avoidance of doubt, if you are an employee of HSBC, this Data Protection Policy forms a part of your employment terms and conditions and should be read in conjunction with such terms and conditions ("Terms and Conditions"). In the event of any conflict or inconsistency between the provisions of this Data Protection Policy and the Terms and Conditions, the provisions of this Data Protection Policy shall prevail.

### **1. Your Personal Data**

From time to time it may be necessary to supply us with Personal Data about yourself and other individuals for purposes in connection with your employment or your job application.

If your application for employment is successful, Personal Data about you and other individuals may also be collected from you during the period of your employment with us.

- 1.1 Where Personal Data is submitted by you on behalf of another individual or concerns another individual other than yourself, 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.

1.2 In this Data Protection Policy, “**Personal Data**” refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which the organisation has or is likely to have access. Examples of such Personal Data which you may provide to us include:

- (a) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to you which you have provided us; and
- (b) your employment history, education background, and income levels.

## 2. **Collection of Personal Data**

2.1 Generally, HSBC may collect your Personal Data in the following ways:

- (a) when you submit forms or applications to us;
- (b) when you submit requests to us;
- (c) when you respond to our requests for additional Personal Data;
- (d) when you ask to be included in an email or other mailing list;
- (e) when you respond to our initiatives; and
- (f) when you submit your Personal Data to us for any other reason.

## 3. **Purposes for the Collection, Use and Disclosure of Your Personal Data**

3.1 Generally, HSBC may collect, use and/or disclose your Personal Data for the following purposes:

- (a) evaluation and assessment of suitability for hiring for particular positions;
- (b) providing employee references and for background screening/vetting;
- (c) determining, processing and reviewing salaries, incentives, discretionary remuneration and other benefits;
- (d) assessing your performance;
- (e) consideration for awards, promotion, training, secondment or transfer;
- (f) considering and processing applications for continuing skill development and training, including organising training and staff development programs;
- (g) providing you with resources and assistance in connection with the performance of your duties (including without limitation making business-related travel arrangements on your behalf);
- (h) consideration of eligibility for and administration of staff loans and other benefits and entitlements (including medical benefits);
- (i) conducting internal investigations and proceedings;

- (j) monitoring compliance with our internal rules and policies;
  - (k) responding to your queries and requests;
  - (l) managing our infrastructure and business operations and complying with internal policies and procedures;
  - (m) facilitating business asset transactions (which may extend to any merger, acquisition or asset sale) involving any HSBC group company;
  - (n) matching any Personal Data held which relates to you for any of the purposes listed; purposes including analytical and statistical studies for our internal business processes;
  - (o) preventing, detecting and investigating crime, including fraud and any form of financial crime, and analyzing and managing our commercial risks;
  - (p) protecting and enforcing our contractual and legal rights and obligations;
  - (q) complying with any applicable local or foreign statute, rule, law, regulation, judgment, decree, directive, sanctions regime, court order, agreement between any HSBC group company and an Authority (as defined in section 4.1(i) of this Data Protection Policy), agreement or treaty between Authorities, which may apply to any HSBC group company or to which any HSBC group company is subject;
  - (r) to assist in any investigation by an Authority where there is a reasonable suspicion of the commission of a crime under any written law in any jurisdiction in which HSBC operates;
  - (s) publishing in internal HSBC publications and broadcasts such as staff newsletters and email;
  - (t) managing or terminating your employment relationship with HSBC;
  - (u) subject to applicable law, any other purpose set out in the Terms and Conditions; and
  - (v) any other purpose reasonably related to the aforesaid.
- 3.2 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 delay or inability to process your application or request.
- 3.3 HSBC may also collect, use and/or disclose your Personal Data for other purposes where you have provided us with your consent.
4. **Disclosure of Personal Data**
- 4.1 Personal Data will be protected and kept confidential but, subject to the provisions of any applicable law, may be disclosed, for the purposes listed above (where applicable), to the following parties:
- (a) HSBC group companies;
  - (b) agents, contractors or third party service providers who provide services such as telecommunications, information technology, payment, payroll, processing, training, storage and archival, to HSBC;
  - (c) companies providing services relating to insurance and/or reinsurance to HSBC;
  - (d) the Credit Bureau (Singapore), or in the event of default or disputes, any debt collection agencies or dispute resolution centres;

- (e) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving HSBC;
- (f) anyone to whom we transfer or may transfer our rights and duties;
- (g) our professional advisors such as our auditors and lawyers;
- (h) third parties seeking employee references in respect of former employees of any HSBC group company;
- (i) 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, court, law enforcement body or any agents thereof, having jurisdiction over any HSBC group company (collectively referred to as “**Authorities**” and each an “**Authority**”);
- (j) the Singapore Bank Employees’ Union, the Singapore Bank Officers’ Association, the Singapore Insurance Employees’ Union or other trade union representing the interest of any employee of any HSBC group company in Singapore by way of a collective agreement; and
- (k) any other person in connection with the purposes set forth above.

4.2 In connection with the purposes set out in this Data Protection Policy, HSBC may from time to time transfer your Personal Data to third parties who are situated overseas. HSBC has put in place contractual agreements to ensure that these third parties will abide by the requirements under the PDPA in collecting, using or disclosing your personal data. Where it is necessary for these third parties to further disclose personal data onward to other third parties, HSBC will endeavour to ensure that these parties also abide by the PDPA. In some instances however your personal data may have to be disclosed to organizations in countries or territories which do not have standards of protection comparable to that under the PDPA.

## 5. **Retention of Personal Data**

5.1 You understand and agree that should your job application be unsuccessful, or your employment with HSBC cease, HSBC may retain documents containing your personal data for such period as HSBC considers in its reasonable discretion necessary for legal or business purposes.

## 6. **Contacting Us – Withdrawal, Access and Correction of your Personal Data**

6.1 If you wish to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy, or if you have any questions, complaints relating to your Personal Data, or you would like to obtain access and make corrections to your Personal Data records, please contact our Data Protection Officer via the HR Administration at [sgp@hangseng.com](mailto:sgp@hangseng.com).