

**Hang Seng Bank Limited – Hang Seng Olive (Mobile App) (“app”)
Privacy Policy Statement (“Statement”)**

This Statement should be read together with our Notice to Customers and Other Individuals relating to the Personal Data (Privacy) Ordinance (the “**Notice**”) and Cookies Policy.

Our privacy principles

Hang Seng Bank Limited (“we”, “us” or “our”) builds its business on trust between our customers and ourselves. To preserve the confidentiality of all personal data you provide to us, we maintain the following privacy principles:

- (a) **Transparency:** We will be clear and transparent as to how we collect and use data, including providing data subjects (including customers, vendors, visitors, and various other persons using the app, including their representatives, agents or nominees) with a statement of how we may use their data where required.
- (b) **Fair and lawful usage:** We will only collect, process and store data lawfully and where we have a legitimate reason to do so.
- (c) **Limited purposes:** We will collect and process data for specified and lawful purposes, and will not use it for further, incompatible purposes without first taking all steps necessary under applicable data privacy laws and regulations.
- (d) **Data minimisation and adequacy:** We will ensure our collection, retention and processing of data is proportionate. We will strike an appropriate balance to ensure that we process sufficient data to carry on our business and achieve any specified lawful purposes, while making sure that we do not collect, retain or process excessive amounts of data.
- (e) **Data quality and accuracy:** We will maintain appropriate standards of data quality and integrity, and we will implement policies in respect of data accuracy, including taking steps to avoid data becoming out of date where appropriate.
- (f) **Data security and retention:** We will retain data securely, implement appropriate data retention policies, and we will dispose of data securely once it is no longer required. We will ensure that appropriate processes are put in place so only those acting on our behalf with a business requirement to access such data are authorised and able to do so.
- (g) **Training and awareness:** We will ensure that those acting on our behalf with access to data are trained appropriately on their obligations regarding those data.
- (h) **Data subject rights:** We will ensure that data subjects’ rights are observed in accordance with applicable data privacy laws and regulations, including any timeline established thereby.
- (i) **Third parties:** Where we appoint a vendor or agent, we will require them to apply standards equivalent to these Data Privacy Principles. We will only disclose data to governmental or judicial bodies or law enforcement or agencies or our regulators where this is allowed by applicable Data Privacy Laws and Regulations, or otherwise required by applicable laws and regulations.
- (j) **Data transfers:** Where we voluntarily transfer data to another HSBC Group entity, third party or to another jurisdiction, we will ensure that the data transfer is lawful and that the recipient is required to apply the same, or equivalent, standards as these data privacy principles.

By maintaining our commitment to these principles, we will ensure that we respect the inherent trust that you place in us.

In addition to our duty of confidentiality to customers, we shall at all times observe the above privacy principles and the Personal Data (Privacy) Ordinance of the Hong Kong SAR in collecting, maintaining and using the personal data of customers in accordance with the Notice.

Push Notification

We may send you push notifications based on your preference made on the settings of this App.

Marketing promotions

Occasionally we may collect personal data from you when you visit this app or when you participate in a contest or promotion (whether online, over the telephone or in branch). The collection and use of your personal data is governed by the Notice. We only collect personal data from you if you voluntarily provide it to us. We may use your personal data to inform you of products, services and other marketing materials which we think may be of interest to you (including by way of push notifications within this app). We or our external research agencies on our behalf may also invite you to participate in market research and surveys and other similar activities. Please refer to paragraph 11 of the Notice for details of our use of your personal data for direct marketing purposes.

You can choose to receive or opt-out from receiving marketing and other promotional materials (through in-app notifications) by turning on/off push notifications and/or personalized marketing notification setting at the time of registration or at any time on the “Settings” page of this app. Your selection will become effective immediately for in-app push notification and become effective within 7 working days for personalized marketing notification setting in this app. For any queries on how to receive or opt-out from receiving marketing and other promotional materials through in-app notifications, you may contact our representatives by calling:

- (852) 2596 6262 for Customer Contact Centre Hotline

Use of Big Data & Artificial Intelligence (“BDAI”)

Big data technologies and artificial intelligence (BDAI) enable companies to process and analyse data at a scale. This has never been possible before. We are using big data and AI to

1. Bring benefits to our customers, for example, by improving customer service
2. Manage risks for ourselves and our customers
3. Better identify and offer relevant products and services to customers
4. Improve operational efficiencies.

Using BDAI brings new responsibilities. We must ensure that BDAI is used ethically. We have a set of principles to help us do this.

You can find our Principles for the Ethical Use of Data and Artificial Intelligence [here](https://www.hangseng.com/content/dam/hase/rwd/resources/important-message/pdfs/principles_for_the_ethical_use_of_data_and_ai.pdf).

<https://www.hangseng.com/content/dam/hase/rwd/resources/important-message/pdfs/principles_for_the_ethical_use_of_data_and_ai.pdf>

Contact us

Request for access to personal data or correction of personal data or for information regarding policies and practices on personal data and kinds of personal data held should be addressed to:

Data Protection Officer
Hang Seng Bank Limited
83 Des Voeux Road Central
Hong Kong SAR
Fax: (852) 2868 4042