

# CIMB Data Protection Policy

We at CIMB Bank take our responsibilities under Singapore's Personal Data Protection Act 2012 (the "PDPA") seriously. We also recognise 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 of your personal data.

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: [dpo@cimb.com](mailto:dpo@cimb.com)

## 1 INTRODUCTION TO THE PDPA

- 1.1 "Personal Data" is defined under the 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 organisation has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, medical records, photographs and video images.
- 1.2 We will collect your 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.

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

- 2.1 The personal data which we collect from you may be collected, used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your personal data, including:
  - (a) processing your enquiries and application for account opening, credit, services and products by the Bank, as well as services and products by other external providers provided through the Bank;
  - (b) providing you with the services and products of the Bank, as well as services and products by other external providers provided through the Bank;
  - (c) administering and/or managing your relationship and/or account(s) with the Bank;
  - (d) carrying out your instructions or responding to any enquiries by you;
  - (e) carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations or risk management procedures (including but not limited to those designed to combat financial crime, "know-your customer", anti-money laundering, counter-terrorist financing or anti-bribery), that may be required by law or that may have been put in place by the Bank;
  - (f) dealing in any matters relating to the services and/or products which you are entitled to under this Agreement (including the printing of credit cards and the printing and mailing of correspondence, statements, invoices, confirmations, advices, information, reports or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages);
  - (g) the recovery of any and all amounts owed to the Bank;
  - (h) the process of reviewing and approving credit and approving the account(s), and the conduct of initial and anticipatory credit checks and assessments, relevant checks, ongoing assessment and verification of ongoing credit worthiness and standing;
  - (i) preventing, detecting and investigating fraud, misconduct, any unlawful action or omission, whether relating to your application or any other matter relating to your account(s), and whether or not there is any suspicion of the aforementioned;
  - (j) managing the Bank's infrastructure and business operations, and complying with policies and procedures that may be required by law or that may have been put in place by the Bank, including those relating to auditing, finance and accounting, billing and collections IT systems, data and website hosting, training, testing, business continuity, and records, document and print management;
  - (k) security and/or verification and in this regard, the Bank may put in place measures to achieve the aforesaid such as closed-circuit television (CCTV) systems on the Bank premises, which would/may capture your image and speech when you are on the Bank premises; audio recordings of your instructions or conversations over the telephone or during face to face communications with the Bank's staff;
  - (l) if consented by you via your registration or participation in any contest, lucky draw, campaign, promotion, event, survey or questionnaire, to administer and provide you with such activities. Some of these activities have additional terms and conditions, which could contain additional information about how we use and disclose your personal data, so we suggest that you read these carefully;

- (m) complying with applicable law in administering and managing your relationship with the Bank;
- (n) if consented by you in the application form(s), account opening document(s) and/or other methods of consent notification, provide for the dispatch of marketing information relating to banking, financial or investment services or products offered by the Bank and the Bank's affiliates, business partners and related companies (whether by the Bank, the Bank's affiliates, business partners or related companies) which the Bank thinks is of benefit or interest to you via your consented method(s) of communication; and/or
- (o) any other purposes which we notify you of at the time of obtaining your consent.

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

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 by law.

- 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, 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, 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.

### **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. 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 yourself 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.

### **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 branch and using the online form set out therein. For a request to access personal data, we will provide you with the relevant personal data within a reasonable time] from such a request being made.
- 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 **4.3**, we will send the corrected personal data to every other organisation to which the personal data was disclosed by CIMB Bank within a year before the date the correction was made, unless that other organisation 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 organisations 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 submitting your request at the following webpage <http://www.cimb.com.sg/index.php?tpl=dpdp> and using the online form set out therein.
- 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.

## 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 CIMB 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 your 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 not updating us of any changes in your 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 legal, regulatory, business and operational obligations.
- 6.4 Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies, and taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the Act. This may include us entering into an appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

## 7 COMPLAINT PROCESS

- 7.1 If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.
- 7.2 Please contact us through one of the following methods with your complaint or grievance:
  - (a) Singapore telephone number : +65 6333 7777
  - (b) E-mail : [dpo@cimb.com](mailto:dpo@cimb.com)  
Attention it to the 'Data Protection Officer'
  - (c) Office address : CIMB Bank Berhad  
50 Raffles Place #09-01  
Singapore Land Tower  
Singapore 048623  
Attention it to the 'Data Protection Officer'
- 7.3 Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our organisation to handle. For example, you could insert the subject header as "**PDPA Complaint**".
- 7.4 We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

## 8 Cookies

### 8.1 Use of “cookies”

Your visit to this Website may be recorded for analysis on the number of visitors to the site and general usage patterns. Some of this information will be gathered through the use of “cookies”. Cookies are small bits of information that are automatically stored on a person’s web browser in their computer that can be retrieved by this Website. Should you wish to disable these cookies you may do so by changing the setting on your browser. However, you will be unable to enter certain part(s) of this Website.

## 9 UPDATES ON DATA PROTECTION POLICY

- 9.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.
- 9.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy will be posted on our website and can be viewed at <http://www.cimbbank.com.sg>.
- 9.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.