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## **Arab Bank plc Shanghai Branch**

### **Privacy Policy for Business Partners**

**Date issued: 26 September 2024**

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# Privacy Policy for Business Partners

Latest updated: 26 September 2024

Arab Bank plc Shanghai Branch (hereinafter referred to as “**ABSH**” or “**We**”) value your privacy and are dedicated to protecting your fundamental privacy rights. This *Privacy Policy for Business Partners* (hereinafter referred to as the “**Policy**”) is formulated in accordance with relevant Chinese laws, regulations and standards. We aim to explain how we process and protect your Personal Information and how you can protect your legal rights and interests.

The Policy applies to our collection and use of Personal Information about you and persons related to you when you interact with us (including but not limited to your application for our jobs, seeking cooperation with us, entering into a supplier/customer relationship with us, providing products or services to us or receiving products or services from us, visiting our workplace, etc.).

We may collect relevant Personal Information about you and persons related to you for further usage, through application forms, quotations, contracts, supporting documents you completed, signed and submitted (hereinafter referred to as “**Documents**”). Before providing us with the Documents, please read carefully and confirm that you have fully understood the Policy and could make the choices you think are appropriate in accordance with the guidelines of the Policy. In particular, you will be prompted by ***bold italics*** to place emphasis on rules regarding your Sensitive Personal Information hereunder.

Unless otherwise stated hereunder, if you do not agree to this Policy or any updates hereto (we will notify you of such updates promptly), our interaction and business cooperation may be negatively impacted.

If you have any questions or concerns about the Policy or related issues, please contact us through the contact information provided in “9. How to contact us”.

The Policy does not apply to any other third-party products, services or businesses (hereinafter collectively referred to as “**Third-party Services**”). Instead, Third-party Services are subject to their own privacy policies. We kindly remind you that you carefully review the privacy policy governing any Third-party Service before using it.

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**Definitions:**

**Personal Information** means all kinds of information related to identified or identifiable natural persons recorded by electronic or other means, excluding the information that has been anonymized.

**Sensitive Personal Information** means the Personal Information that is likely to result in damages to the personal dignity of any natural person or damage to his or her personal or property safety once disclosed or illegally used, including such information as biometric identification, religious belief, specific identity, medical health, financial account and whereabouts and tracks, as well as the Personal Information of minors under the age of 14.

**Children** means any person under the age of fourteen.

**Overseas Recipient** means an organization or individual outside the territory of the PRC that receives Personal Information from ABSH.

The Policy will help you understand the following:

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## 1 How We Collect and Use Your Personal Information

Adhering to principles of legality, legitimacy, necessity, openness, and transparency, we will collect and use Personal Information that you provide or generate during our interaction.

Meanwhile, to improve your experience with our products or services or facilitate our cooperation, we may launch new or upgrade original business and optimize our internal procedure. This may lead to changes in types of Personal Information to collect and/or purposes or ways of using them. If we do so, we will separately explain to you in the forms of updates to this Policy. We will accordingly seek your consent afresh before we proceed with the aforesaid processing.

### 1.1 Personal Information We Collect from You

The table below describes the Personal Information we may collect and use in different business scenarios.

#### 1.1.1 For job applicants:

Business Scenario	Types of Personal Information we collect and use
Processing your job application	(1) Basic Personal Information (including name, mobile phone number, email address); (2) Personal education and work information (including educational background, work experience).

#### 1.1.2 For clients

We currently provide services to non-individual clients only. In order to offer banking products/services or conduct banking business for our prospective or existing non-individual clients, to maintain proper and secure operation of banking business, to prevent and control banking-related risks and to perform various legal obligations, and if you are a relevant person of our prospective or existing non-individual clients, the Personal Information we may collect and use in the relevant business scenario is set out in the table below.

Relevant person mentioned above means any person who is related to our prospective or existing non-individual clients, including but not limited to, legal representatives or principals, directors, chairmen, general managers, CFOs, department heads, project managers of any company, partners or partnership members of partnership organizations, shareholders, beneficiary owners, beneficial owners of trusts, trustees, settlors, or guarantors, designated account holders, designated payees, account holders' representatives, agents, administrators, or persons acting in concert or as designees, attorney-in-fact, signatory, and officers of the account holders.

Business Scenario	Types of Personal Information we collect and use
To process/provide bank account opening, deposits, receipts and payments, transfers, credit facilities to our	(1) Basic Personal Information (including name, citizenship, date of birth, telephone numbers, cell phone numbers, age); (2) Personal identifiable information ( <i>including type of identity document, identity document number,</i>

prospective or existing non-individual clients	<p><i>place of issue of identity document, date of issue of identity document, date of expiration of identity document, date of expiration of visa</i>);</p> <p>(3) Personal educational and working information (including education, position, title, professional qualifications, working experience);</p> <p>(4) Personal location information: <i>residential address</i>, work address;</p> <p>(5) Other information: Whether or not the relevant person is an Arab bank client, client number; <i>political background information (whether or not the relevant person is a politically exposed person, name of the politically exposed person, degree of relationship with the politically exposed person)</i>; whether or not there are U.S. factors involved (including whether or not the relevant person is a U.S. citizen, a U.S. Green Card holder, a U.S. resident, U.S. taxpayer, whether born in the U.S.); basis of proxy authorization, expiration date of authorization and relationship with the client; source of funds of major shareholders; kinship (if family management and/or concert party scenarios are involved).</p>
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### 1.1.3 For suppliers

In the course of interacting with our suppliers, we may collect Personal Information from suppliers or supplier contacts. The specifics of this collection are shown in the table below:

Business Scenario	Types of Personal Information we collect and use
Business cooperation with suppliers	Personal contact information, including the person's name, phone number, e-mail address, address, company, and position.

### 1.1.4 For offline visitors

In order to maintain public safety and the safety of your life, health and property and that of others, we will install a video surveillance system in the public areas such as the main entrances and exits of the office premises. When you pass through the area covered by such surveillance system, the system will record your personal image and moving image. We will provide prominent notices in the areas covered by such surveillance systems, and we will only process surveillance information to the extent permitted by law.

**If you provide us with Personal Information about other people, please ensure that you have fully informed them of this Policy in its entirety before you provide us with Personal Information, and that you have either obtained the separate consent**

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**of the person concerned, or fulfilled the exceptions to the obtaining of consent, for the provision of Personal Information to us and for the processing of the Personal Information of those persons by us in accordance with this Policy.**

Our business is updating and developing constantly. If you apply to us for other business not covered in the above for which we have to collect your or relevant person's Personal Information, we will separately explain to you the purpose, manner and scope of collection, use and disclosure of Personal Information through reminders, notices, interactive processes, applications, agreements or other appropriate means.

## **1.2 Purposes for which we use your Personal Information**

We generally use the Personal Information described above for the following purposes or for purposes directly or reasonably related to them:

- (1) Processing your job application, including conducting background checks on you for recruitment purposes;
- (2) Assessing your and/or relevant persons' creditworthiness, processing applications for credit or other banking services;
- (3) Post-credit management;
- (4) Vendor management;
- (5) Client management and services;
- (6) Conclusion and performance of contracts with you;
- (7) Fulfilment of the applicable client identification obligations, anti-money laundering and anti-terrorist financing obligations, reporting or information submission obligations to relevant authorities, and other obligations under applicable laws and regulations;
- (8) For the purpose of conducting internal corporate investigations in the event of government enforcement, receipt of internal reports, occurrence of audit anomalies and unusual business operation scenarios;
- (9) To protect our legal rights and interests in the event of a dispute or in judicial or governmental regulatory proceedings;
- (10) To protect the security of workplace, life, health and property;
- (11) For any other purposes necessary for, ancillary to, or arising from the above specified purposes.

When we need to use Personal Information for purposes other than those set out in this Policy, we will obtain your prior consent.

When we change the original purpose for which the Personal Information was processed, we will obtain your prior consent.

## **1.3 Exceptions to Your Consent**

Notwithstanding any other rules in this Policy, in the following cases, we do not need to obtain your consent for the processing of your Personal Information (including the

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collection, use, storage, processing, transmission, provision, public disclosure, deletion, etc. of Personal Information):

- (1) where it is necessary for the conclusion or performance of a contract to which the individual is a contracting party;
- (2) where it is necessary for performing a statutory responsibility or statutory obligation;
- (3) where it is necessary for responding to a public health emergency, or for protecting the life, health or property safety of the natural person in the case of an emergency;
- (4) where the Personal Information is processed within a reasonable scope to carry out any news reporting, supervision by public opinions or any other activity for public interest purposes.
- (5) where the Personal Information, which has already been disclosed by the individual or otherwise legally disclosed, is processed within a reasonable scope and in accordance with *Personal Information Protection Law of the People's Republic of China*; or
- (6) any other circumstance as provided by any law or administrative regulation.

## **2 How We Store Your Personal Information**

### **2.1 Location of storage**

Paper documents containing your Personal Information will be stored securely in ABSH office in accordance with our internal regulations. Your Personal Information will also be stored electronically on a secure server operated by our offshore headquarters, Arab Bank plc (hereinafter referred to as the "**Overseas Headquarters**").

### **2.2 Period of storage**

We will continue to store your Personal Information for the duration of our cooperation with you. After the purpose of the processing of your Personal Information has been achieved, we will delete or anonymize your Personal Information within a reasonable period of time, unless otherwise stipulated by law or regulation regarding the retention period of specific data or in order to protect our rights in court (e.g., for statute of limitations reasons). If the aforementioned deletion or anonymization is not possible, we will stop the processing other than storage and take the necessary security protection measures.

## **3 How We Share, Transfer and Publicly Disclose Your Personal Information**

### **3.1 Sharing**

Subject to Section 1.2 of this Policy, we may share your Personal Information with third parties in the following circumstances:

- (1) We may share your Personal Information with our offshore affiliate, Arab Bank plc Singapore Branch ("**AB Singapore**") and transfer your Personal Information abroad for recruitment purposes. We will only share information that is necessary and subject to the purposes stated in this Policy. Details of the information we share

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can be found in this Policy under "7. Cross-border Transfers of Personal Information".

- (2) We may share your Personal Information with AB Singapore and transfer your Personal Information abroad for the purpose of credit approval in accordance with the Arab Bank plc's business processes. We will only share information that is necessary and subject to the purposes stated in this Policy. Details of the information we share are set out in this Policy under "7. Cross-Border Transfers of Personal Information".
- (3) We may share your Personal Information with the Overseas Headquarters and transfer your Personal Information abroad, for the purposes of client identification, high-risk client approval and centralized client management in accordance with applicable laws and regulations. We will only share information that is necessary and subject to the purposes stated in this Policy. Details of the information we share with our Overseas Headquarters can be found in this Policy under "7. Cross-Border Transfers of Personal Information".
- (4) We may share your Personal Information in accordance with laws and regulations, the need to resolve litigation disputes, or the mandatory requirements of administrative or judicial authorities. In such cases, we will inform you of such information sharing, unless otherwise provided by laws and administrative regulations.

### **3.2 Transfer**

We will only transfer your Personal Information in the following circumstances:

- (1) where we will transfer your Personal Information to other parties subject to your explicit consent;
- (2) In the case of mergers, acquisitions, division, dissolution, bankruptcy liquidation or reorganization where the transfer of your Personal Information is necessary. If any of your Personal Information will be transferred, we will inform you of the recipient's name, its contact information and request such recipient to comply with this Policy. Otherwise, we will ask such receiving party to ask for your consent afresh.

### **3.3 Public disclosure**

We will only publicly disclose your Personal Information in the following circumstances:

- (1) subject to your explicit consent;
- (2) disclosure based on law: we may publicly disclose your Personal Information if required to do so by law, legal process, litigation or mandatory requirements of governmental authorities.

## **4 How We Protect Your Personal Information**

We attach great importance to the security of your Personal Information. For example, for documents containing Personal Information, we keep them in a safe place and have internal mechanisms in place to prevent unauthorized access, extraction and use. For

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electronic information, we use trusted protection mechanisms to prevent malicious attacks on Personal Information and deploy access control mechanisms to prevent unauthorized access. The measures we take are designed to provide you with a level of security that is commensurate with the risks arising from the processing of your Personal Information. We will take reasonably practicable steps to try to avoid collecting unnecessary Personal Information.

Although we cannot guarantee that our processing of your Personal Information is perfectly safe due to the absence of any methods that can always secure the Internet transmission, electronic storage or physical storage, we will still strive to take appropriate technical and organizational safeguard measures to protect your Personal Information from theft, loss, abuse, unauthorized access, duplication, collection, use, disclosure, alteration, or destruction.

In the event of an unfortunate security incident regarding your Personal Information, we will, pursuant to the requirements of laws and regulations, promptly inform you of the following matters: the basic information and possible impact of the security incident, the measures we have taken or will take to deal with the incident, the suggestions on what you can do to independently prevent and reduce risks, and available remedies for you in this regard and so on. We will timely notify you of relevant information regarding the security incident by different means including email, letter, telephone, or internal notifications. Meanwhile, we will also proactively report the processing of Personal Information security incidents to the competent authorities pursuant to applicable regulatory requirements.

## **5 Your rights**

### **5.1 Access and Copy Your Personal Information**

You may access and copy your Personal Information kept by us. Under the premise of technical feasibility and in compliance with the conditions stipulated by the Cyberspace Administration of China, we may also transmit the copy of your Personal Information directly to a third party designated by you at your request.

### **5.2 Correct and Supplement Your Personal Information**

If you find that the Personal Information we keep is inaccurate or incomplete, you may request us to correct or supplement your Personal Information.

### **5.3 Delete Your Personal Information**

You may request us to delete Personal Information in the following circumstances:

- (1) Where the purpose of processing your Personal Information has been achieved, cannot be achieved, or is no longer necessary to be achieved;
- (2) Where the retention term of your Personal Information has expired.
- (3) Where you withdraw your consent previously given to our collection and use of your Personal Information;
- (4) Where our processing of Personal Information violates laws and regulations, or the agreement with you;

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(5) Other circumstances stipulated by laws and administrative regulations.

#### **5.4 Change the Scope of Your Consent or Withdraw Your Consent**

To the extent that you have consented to our processing of your Personal Information, you may change the scope of your consent to our processing of your Personal Information or to withdraw your consent. However, please understand that the processing of your Personal Information is necessary for us to carry out business cooperation with you or handle recruitment process. This means upon your withdrawal of consent, we will no longer provide you with the relevant services or continue with the business cooperation or recruitment process with you. However, your withdrawal of consent will not affect the validity of our processing of your Personal Information upon your previous consent.

#### **5.5 Obtain Explanations of the Policy**

You may request an explanation of the Policy.

#### **5.6 Respond to Your Above Request**

You may exercise your rights as described above by contacting us through the contact information provided in “9. How to Contact Us” hereunder. For security purposes, you may be required to provide a written request. We may ask you to verify your identity before processing your request.

We will respond to your request within fifteen (15) working days. If you are not satisfied or have any questions, you can contact us through the contact information provided in “9. How to Contact Us” hereunder.

We may reject your requests that are technically difficult to respond to, or that are not required to be responded to pursuant to laws and administrative regulations, or where responding to your requests would violate laws and administrative regulations. We will give you an explanation when we decide to reject.

### **6 How We Process Children’s Personal Information**

In principle, we do not process *Children’s Personal Information*. If we find that Personal Information collected includes Children's Personal Information, we will promptly delete or anonymize it; if you find that we have collected *Children's Personal Information*, please contact us using the contact information provided in "9. How to Contact Us" of this Policy and we will promptly delete or anonymize it.

### **7 Cross-border Transfer of Personal Information**

We, as a foreign bank with cross-border business processes, management structures and technical systems, may provide our products or services or manage information through resources and servers located outside the People's Republic of China. For this purpose, your Personal Information may be transferred to, or accessed by, our affiliates located outside the People's Republic of China.

Details of cross-border transfers of your Personal Information are set out below:

<b>Name of Overseas Recipient</b>	Arab Bank plc
<b>Contact information</b>	<u>DPO@arabbank.com.cn</u>
<b>Purpose of processing</b>	Recruitment, client identification, high-risk client approval, client relationship management, credit approval
<b>Methods of processing</b>	<p>(1) ABSH sends Personal Information via email to the Overseas Recipient and to AB Singapore, which has been entrusted the processing of Personal Information by the Overseas Recipient;</p> <p>(2) ABSH logs into the information system operated by the Overseas Recipient through a dedicated line and manually enters personal information;</p> <p>(3) The Overseas Recipient and its commissioned AB Singapore process personal information within the scope of the above-mentioned processing purposes.</p>
<b>Types of outbound personal information</b>	<p>(1) Job applicants : (i) Basic Personal Information (including name, mobile phone number, email address); (ii) Personal education and work information (including educational background, work experience).</p> <p>(2) Client-related personnel: client number; Name (including Arabic, English/French); position; occupation; citizenship; <b><i>political background information (whether or not the client is a politically exposed person, name of the politically exposed person, degree of relationship with the politically exposed person)</i></b>; whether or not there are U.S. factors involved (including whether or not the personnel is a U.S. citizen, a U.S. Green Card holder, a U.S. resident, U.S. taxpayer, whether born in the U.S.); <b><i>identity document information</i></b> (including <b><i>type of identity document, identity document number, place of issue of identity document, date of issue of identity document, date of expiration of identity document, date of expiration of visa</i></b>); date of birth; <b><i>address of residence</i></b>; address of work; telephone number, cell phone number; basis of authorization of the agent, date of expiration of the authorization and relationship with the client; source of funds of the major shareholders; age; academic qualifications; qualifications for the practice of the profession; experience in the field of practice of the profession; kinship relationship (if family</p>

	management and/or concerted party scenarios are involved)
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In addition, based on our daily operation and management needs (e.g., business reporting, operation decision-making, technical communication, etc.), we may sporadically, regularly or irregularly provide documents and materials containing a small amount of your Personal Information to our Overseas Headquarters by way of e-mail, online meeting, instant chat tool communication, etc. Such outbound Personal Information is covered by the Personal Information that has been outbound in the above outbound scenarios.

We will fulfill the obligations related to the cross-border transmission of Personal Information in accordance with the *Personal Information Protection Law of the People's Republic of China* and relevant laws and regulations. We will sign the Standard Contract for Export of Personal Information ("**Standard Contract**") with the Overseas Headquarters, requiring the Overseas Headquarters to process your Personal Information in accordance with the agreed scope, so that your Personal Information will receive the same level of protection outside the People's Republic of China as it does inside the People's Republic of China.

Please be informed that we will agree with the Overseas Recipient that you are the third-party beneficiary under the Standard Contract, and you can enjoy the rights of the third party beneficiary according to the Standard Contract, including requesting access to and copying of your Personal Information that has already been exported from China to the Overseas Recipient.

If you wish to learn more about the Standard Contract, you may contact us using the contact information provided in "9. How to Contact Us" of this Policy.

You may exercise your rights as a subject of Personal Information by submitting a request to us in the manner and according to the procedures set forth in "5. Your Rights" of this Policy, or by submitting a request to an Overseas Recipient using the contact information of the Overseas Recipient listed in this Policy.

## 8 How We Update this Policy

We may update the Policy in due course to adapt to the development of law, technology or business. However, without your explicit consent, we will not undermine your rights under the Policy. We will publish the latest version of the Policy on this page. You can check the latest update time of the Policy from the "latest update" at the top of the Policy.

If we make major changes to the Policy, we will notify you in an appropriate manner. If you continue to use our services or interact with us in other forms after changes to this Policy, you acknowledge that you have fully read, understood, and are willing to be bound by the revised Privacy Policy. Such changes in the Privacy Policy will come into effect as of the date specified in the notification. If you do not agree with the updated Policy, you should contact us immediately.

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The major changes to Policy include but are not limited to:

- (1) The name and contact information of the Personal Information processor;
- (2) The purpose and method of processing Personal Information, the type of Personal Information to be processed and the data retention period;
- (3) The way and procedure for you to exercise your rights provided for by *Personal Information Protection Law of PRC*;
- (4) Any other matter to be informed as required by law or administrative regulations.

## **9 How to Contact Us**

If you have any questions or complaints or suggestions regarding this Policy or matters related to the protection of Personal Information, you can contact us by sending e-mails to [DPO@arabbank.com.cn](mailto:DPO@arabbank.com.cn) during weekdays.

We will review your inquiry as soon as possible and respond within fifteen (15) days or the statutory period stipulated otherwise in applicable laws and regulations after verifying your identity.