

**China CITIC Bank London Branch
Client Privacy Notice**

Last Updated: 18 February 2019

China CITIC bank London Branch ("CNCBLB") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about our clients (i.e. individuals to whom we provide our banking or investment management services and individuals who are employees of or operating on behalf of our corporate clients), and how you can exercise your privacy rights.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

What does CNCBLB do?

CNCBLB is a bank, based in the United Kingdom and authorised by the Prudential Regulation Authority (PRA) and regulated by the Financial Conduct Authority and the PRA, but with group companies around the world. Our parent company is based in China. Our banking products and services include Treasury and banking.

What personal information does CNCBLB collect and why?

The personal information that we may collect about you broadly falls into the following categories:

- Information that you provide

We ask you to provide certain information. The types of information we ask you to provide, and the reasons why we ask you to provide it, include:

Types of personal information	Why we collect it
Name and contact details such as address, telephone number and email and details of your employer where you are an employee or otherwise a contact for our corporate clients	For the purpose of providing the banking and asset management products and services to you and to communicate with you in connection with those products and services We may also occasionally contact you with information about other products and services we offer which we believe you or your employer may be interested in
Personal data you may provide in communications	Where we are corresponding with you, you may provide personal data in that correspondence such as in connection with an enquiry or complaint
Information such as copies of passports, driving license copies or other government issued ID, passport number, signatures, tax identification number and utility bills	For identification purposes and to prevent fraud in connection with accounts and investments and to comply with anti-money laundering requirements
CCTV footage	If you visit our premises we may record CCTV footage for security purposes

If we ask you to provide any other personal information not described above, then the personal information we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect your personal information.

- Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources (including, without limitation, World Checking services), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties includes:

Types of personal information	Why we collect it
Criminal records and proceedings checks and third party database checking searches	To comply with anti-money laundering requirements in performing sanction checks
Account information (including beneficial owner information and investments held by nominees) and payments made	To administer investments, make payments, etc. in order to provide our banking and asset management services
Net worth assessments	For client on-boarding, in relation to client categorisation and product suitability assessments
Segregated mandate contacts and contact details of counterparties and underlying obligors	For client on-boarding, to enter into MRPA's and to provide our banking and asset management services
Information about claims and proceedings (or potential claims and proceedings) by or against you	To identify, exercise and defend contractual and other legal rights

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you if and where this is permitted by applicable data protection laws.

Who does CNCBLB share my personal information with?

We may disclose your personal information to the following categories of recipients:

- to our **group companies, third party services providers and partners** who provide data processing services to us, or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information. A list of our current group companies is available here [add website address];
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation including anti-bribery and corruption regulations and anti-money laundering laws, (ii) to exercise, establish or defend our legal rights, (iii) for fraud prevention purposes (iv) to protect your vital interests or those of any other person;
- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;

- to any other person with your consent to the disclosure.

Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or from third parties (such as to comply with anti-money laundering laws and fraud prevention) or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

We have summarised these grounds as Contract, Legal obligation, Legitimate Interests and Consent and outline what those terms mean in the following table.

<i>Term</i>	<i>Ground for processing</i>	<i>Explanation</i>
Contract	Processing necessary for performance of a contract with you or to take steps at your request to enter a contract	This covers carrying out our contractual duties and exercising our contractual rights.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work and avoiding unlawful discrimination.
Legitimate Interests	Processing necessary for our or a third party's legitimate interests	We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data. Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.
Consent	You have given specific consent to processing your data	In general processing of your data in connection with employment is not conditional on your consent. But there may be occasions where we do specific things such as getting a criminal record

		check for a role which is regulated and rely on your consent to our doing so.
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If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us” heading below.

How does CNCBLB keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include access controls, password protection and ID verification.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our servers are located in London and China, and our group companies and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. These include implementing the European Commission’s Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law.

Our Standard Contractual Clauses can be provided on request. We have implemented similar appropriate safeguards with our third party service providers and partners and further details can be provided upon request.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below.

- In addition, if you are a resident of the European Union, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this by responding to the email we send you by replying that you wish to “opt-out” to the e-mails we send you. You may also opt-out of marketing emails as well as other forms of marketing (such as postal marketing or telemarketing), by contacting us using the contact details provided under the “How to contact us” heading below.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Privacy Notice was last updated by checking the date displayed at the top of this Privacy Notice.

How to contact us

If you have any questions or concerns about our use of your personal information, please contact us using the following details: rhod.sutton@uk.citicbank.com or call us on + 20 7710 9100