

Data Privacy Notice

Notice relating to the Personal Data (Privacy) Ordinance

The Hongkong and Shanghai Banking Corporation Limited (“**HSBC**” or the “**Bank**”, which will be used interchangeably) and HSBC Life (International) Limited (“**HSBC Life**”) (collectively referred to in this notice as “**we**”) protect your privacy. Read this notice to find out how we collect, store, use and share your personal data.

1

HOW WE COLLECT AND STORE YOUR DATA

We collect your data

- when you interact with us and participate in our Well+ programme (the “**Programme**”), including when you use our HSBC HK Mobile Banking app
- visit our websites (please see the “Privacy and Security” section of www.hsbc.com.hk and refer to “Use of cookies policy” for details of how we use cookies)
- from other people and companies, including third party services providers (such as activity tracking platforms and providers; health and wellness technology platforms and providers) and our group companies.

We may store your data locally or overseas, including in the cloud. We apply our global data standards and policies wherever your data is stored.

We’re responsible for keeping your data safe in compliance with Hong Kong law. Any collection of data by third parties as data user is subject to their respective terms and data privacy notices.

2

WHAT WE USE YOUR DATA FOR

We use your data

- to administer and facilitate the operations of the Programme
- to send you direct marketing if you’ve consented to it
- to consider applications for, offer, provide and manage products and services

For example: (i) insurance, annuities, pensions and health and wellness products and services; (ii) educational materials; (iii) products and services relating to campaigns and promotions which you have signed up to

- to design and improve our products, services and marketing
- to help us and our group companies comply with laws, regulations and requirements, including our internal policies, in or outside Hong Kong
- to detect, investigate and prevent financial crimes
- for the other purposes set out in section B.

3

WHO WE SHARE YOUR DATA WITH

We share your data with

- our group companies
- third parties who help us to provide services to you or who act for us
- third parties who you consent to us sharing your data with
- local or overseas law enforcement agencies, industry bodies, regulators or authorities
- the other third parties set out in section C.

We may share your data locally or overseas.

You can access your data

You can request access to the data we store about you. We may charge a fee for this.

You can also ask us to

- correct or update your data
- explain our data policies and practices.

You control your marketing preferences

You control whether you receive marketing from us.

You can change this at any time by contacting us, updating your preferences on internet banking and/or the HSBC HK Mobile Banking app.

You can contact us

dfv.enquiry@hsbc.com.hk

The Data Protection Officer HSBC,
PO Box 72677, Kowloon Central Post
Office, Hong Kong

A

Collect and store

We may collect

- your name, date of birth, age, gender, email address, physical mail address and telephone number
- medical and health/lifestyle and wellness data such as your heart rate, BMI and steps count
- your geographic data and location data based on your mobile or other electronic device
- your data provided in risk profiling questionnaire (the Bank only)
- your data related to your banking activities at HSBC (the Bank only)
- data from people who act for you or who you deal with through our services
- data from public sources, aggregators and other sources available to us.

If you don't give us the relevant data then you may not be able to participate in the Programme.

We may also generate data about you

- by combining information that we and our group companies have collected about you
- based on the analysis of your interactions with us and information which we have collected about you
- through the use of cookies and similar technology when you access our website or apps.

B

Use

We use your data to

- provide products and services to you
- help us to comply with requirements or requests that we or our group have or receive such as legal or regulatory in or outside Hong Kong. Sometimes we may have to comply and other times we may choose to voluntarily comply
- create and maintain the credit and risk related models of our group (such as underwriting models, health and wellness models and models/algorithms for data analytics and artificial intelligence)
- manage our business, including exercising our legal rights
- provide personalised advertising to you on third party websites (this may involve us aggregating your data with data of others)
- other uses relating to the above or to which you have consented.

If you provide data about others

If you provide data to us about another person, you should tell that person how we will collect, use and share their data as explained in this notice.

C

Share

We share your data with

- third party services providers (such as activity tracking platforms and providers, and health and wellness technology platforms and providers)
- local or overseas bodies or authorities such as legal, regulatory, law enforcement, government and tax and any partnerships between law enforcement and the financial sector
- any third party who we may transfer our business, policies or assets to so it can evaluate our business and use your data after any transfer
- partners and providers of reward under the Programme, co-branding or loyalty programmes, charities or non-profit organisations
- social media advertising partners (who can check if you have or use our products and services and send our adverts to you and advertise to people who have a similar profile to you).

We may share your anonymised data with other parties not listed above. If we do this you won't be identifiable from this data.

D

Direct Marketing

This is when we use your data to send you details about health, wellness, financial, banking, insurance, pensions, annuities and/or related products, services, offers and promotions provided by us or our partners under the Programme, co-branding or loyalty programmes, charities or non-profit organisations, including additional offers and rewards for the Programme.

We may use data such as your demographics, the products and services that you're interested in, location data, social media data, analytics, health and wellness data and information from third parties when we market to you.

We don't give your data to others for them to market their products and services to you. If we ever wanted to do this, we'd get your separate consent.

This notice will apply for as long as we store your data. We'll send you the latest version at least once a year. If we use your data for a new purpose, we'll get your consent.