

Sumitomo Mitsui Banking Corporation (China) Ltd

Privacy Policy (for Corporate Client)

Promulgated on October 23, 2023

Updated on October 23, 2023

Effective on October 23, 2023

Dear Client (“you”), Sumitomo Mitsui Banking Corporation (China) Ltd. (“SMBC” or “we”) value your privacy a lot and will adhere to the principles of lawfulness, propriety, necessity, good faith, openness and transparency, etc., and take protective measures for your personal information. To ensure that your personal information is collected and used legally, reasonably and appropriately, transferred and stored in a safe and controlled manner, we have formulated this policy. Please carefully read this policy and ensure you understand our principles of processing personal information.

For your attention, please carefully read and confirm the terms and conditions in **bold** that impact your rights and interests materially and are related to your sensitive information.

This policy includes:

1. How we collect and use personal information
2. How we use Cookie and similar technologies
3. How we store and protect your personal information
4. How we provide your personal information to others
5. Your rights
6. How we process personal information of minors
7. How your personal information is transferred globally
8. How we update this policy
9. How to contact us

1. How we collect and use personal information

Personal information refers to all kinds of information recorded electronically or in other ways that can identify the identity of the particular natural persons independently or in combination with other information or reflect particulars on the activities of particular natural persons, such as name, date of birth, ID certificate number, biometric identification, address, communication and contact details, history and contents of communications, account number and password, property information, credit information, whereabouts, accommodation, medical health information, and transaction information, etc.

Sensitive personal information refers to personal information that, once leaked or illegally used, can easily harm the dignity of natural persons, endanger their personal and property safety, cause damage to personal reputation, physical and mental health, or discriminatory treatment, such as personal property information, medical health information, biometric identification, personal ID, network identification and

other information.

For the purposes of the policy set forth below, we may collect and use the personal information you provide voluntarily or generated from handling business or receiving services at SMBC, and lawfully collected from third parties in accordance with laws and regulations or your authorization. If we need to collect additional personal information from you or use the information we have collected for other purposes, we will inform you in a reasonable manner and re-obtain your consent before collecting it. If any sensitive personal information is involved, we will process your personal information in accordance with laws and regulations.

(1) Personal information provided voluntarily by you in using our core services

First, to achieve the core business functions via all our channels, we may need to collect relevant personal information from you. Here follow the details of our core business functions and the personal information that needs to be collected to achieve those functions. If you refuse us to collect such personal information, the relevant services will NOT be available to you.

Please note that if you provide personal information of others, make sure you have obtained authorization from the related subjects.

a. Opening bank account

In accordance with laws, regulations and regulatory requirements, when you apply to open an account at our bank, we will collect your legal representative's name (both in Chinese and English), **certificate type, certificate number, date of expiry of the certificate, phone number**, occupation; authorized person/agent's name (both in Chinese and English), date of birth, certificate type, certificate number, date of expiry of the certificate, phone number, occupation; beneficial owner's name (both in Chinese and English), date of birth, **certificate type, certificate number, date of expiry of the certificate**, nationality, **address**; shareholder/controlling shareholder's name (both in Chinese and English), date of birth, **certificate type, certificate number, date of expiry of the certificate**, nationality, **address**, profession, **domicile residence address**; executives' and directors' name (both in Chinese and English), occupation; controlling shareholder's declaration of tax residence status (both in Chinese and English), date of birth, **current residence address**, country of birth, **taxpayer identification number**.

b. E-banking service

When you use our e-banking services and bank-enterprise interconnection services, and create a related account to verify your identity, we will collect the users (including system administrator/authorized person (approver)/operator/inquiry user, etc.) 's name (both in Chinese and English) and copy of the authorized person's **ID card/passport/mainland travel permit for Hong Kong, Macao and Taiwan resident**.

c. Saving and withdrawal of deposit

When you use our saving and withdrawal services (including structured deposit services, cash deposit and withdrawal services, and deposit services), to verify your identity for providing related services to you, in accordance with the industry regulatory requirements and in response to the inspection by the external regulatory authorities, we will collect your agent's ID card number.

d. Credit Business

When you use our credit business, for the purpose of providing the relevant services to you, compliance review and risk control in credit business, we will collect agent's name, **ID card number, salary, transaction flow, real estate information, and address**. (Attention please when handling relevant business for you, for the purpose of compliance review and fulfilling the services provided to you, we may

need to collect counterparty information; at the same time, we may collect loan proof materials containing personal information;)

e. Trade finance business

When you use our trade finance services (including letter of credit, collection business, etc.), to verify your identity for providing related services to you, in accordance with the industry regulatory requirements and in response to the inspection by the external regulatory authorities, we will collect beneficiary's name, **ID card or passport number**.

f. RMB payment settlement business

When you use our RMB payment settlement, to verify your identity for providing related services to you, in accordance with the financial regulatory requirements and in response to the inspection by the external regulatory authorities, we will collect the payer's name, **phone number, ID card of the payer, bank account number**; payee's name, **bank account number**, account opening institution. (Attention please when handling relevant business for you, to fulfill the services provided to you, we will also collect the names and bank card numbers of the payees for remittances, transfers, etc.)

e. Cross-border payment settlement business

When you use our cross-border payment settlement business, to verify your identity for providing related services to you, in accordance with the industry regulatory requirements and in response to the inspection by the external regulatory authorities, we will collect the payer's name, **ID card number (or certification of foreign nationality, phone number)**; payee's name, **bank account number**, nationality.

f. Bank statement mailing service

When you use our bank statement mailing service, for providing related services to you, we will collect your bill information, and the recipient's **mail address and phone number**.

(2) Exceptions to obtaining authorization and consent

In accordance with applicable laws, regulations and regulatory requirements, we may collect and use your personal information without your consent under the following circumstances:

a. Directly related to our performance of obligations under laws, regulations and regulatory requirements;

b. Directly related to national security or national defense security;

c. Directly related to public security, public health or significant public interests;

d. Directly related to criminal investigation, prosecution, enforcement of judgement and etc.;

e. For the protection of your or other individual's life, property, and other significant legitimate rights and interests, where it is difficult to obtain your or such individual's prior consent

f. Collect or use your personal information that has been willingly disclosed to the public by you;

g. Collect or use personal information received from legally and publicly disclosed information, such as legitimate news reports, government information publication or other channels

h. Necessary for entering into and performing contract(s) according to your instructions;

i. Necessary for maintaining secure and stable operation of our products or services, such as to detect or handle malfunction of the products or services;

j. Under any other circumstance as stated in any law, regulation, or under regulatory requirements.

Our services to you are constantly updated and evolving. If you choose to use any other services not listed above for which we have to collect your information, we will separately explain to you the scope and purposes of personal information we collect by the methods of pop-ups, interactive processes or

agreements, and obtain your consent for that before we collect your personal information required for relevant services. We will collect, use, store, disclose and protect your information in accordance with this policy and corresponding customer agreement provisions.

2. How we use Cookie and similar technologies

(1) Cookie

In order to ensure the normal operation of our services, we will store small data files named Cookie on your computers or mobile devices, which usually contains identifiers, site names, certain numbers and characters. With the help of Cookies, data such as your preferences could be stored. We do not use Cookies for any purpose other than those stated in this policy. You may manage or delete Cookies based on your preference. You may remove all the Cookies stored on your computer, and most web browsers have the function of blocking Cookies.

(2) Do Not Track

Many web browsers provide a “Do Not Track” function that can send a signal to the websites you visit to indicate you do not wish to be tracked. Up to now, major Internet standardization organizations have not established policies to specify how websites shall handle these requests. However, if you enable Do Not Track in your browser, all our websites will respect your selection.

3. How we store and protect your personal information

(1) Storage

The personal information collected and generated within the territory of the People’s Republic of China will be stored within the territory of the People’s Republic of China. However, your personal information may be transferred overseas with your authorization or consent for the purpose of processing cross-border business or handling our services. In such cases, we will comply with the laws, regulations and regulatory requirements and take effective measures to protect your personal information. For example, we will require overseas institutions to keep your personal information confidential through agreements, verification, etc. before such cross-border data transfer.

We will limit the maximum retention period of your personal information to the extent required by laws and regulations and as necessary for the purpose of this policy only. Upon the expiration of such retention periods, we will delete or anonymize your personal information.

(2) Protection

We have used industry-standard security measures to protect the personal information you provide to prevent unauthorized access, public disclosure, use, modification, damage or loss of data. For example, we will use encryption to ensure data confidentiality and trusted protection mechanisms to protect against malicious attacks, deploy access control mechanisms to strictly restrict access to the data, systematically monitor access to and processing of the data, and ensure that only authorized personnel have access to personal information. Business personnel and developers can only access personal information based on operation and maintenance needs; and we conduct security and privacy protection training courses to enhance employee awareness of the importance of protecting personal information, and require relevant personnel to execute confidentiality agreements, etc.

We will do our best to ensure or guarantee the security of the personal information provided by you. At the same time, please properly keep your account’s login name, identity information and other identity elements, and use a strong password to ensure the security of your account. We will identify you with the

login name and other identity elements of you when you use our services. You may suffer from losses and adverse legal consequences in the case of leakage of such information. If you're aware that the account's login name and/or other identity elements might be or have been leaked, please contact us immediately so that we may take corresponding measures in a timely manner to avoid or mitigate the losses.

In the case of any personal information security incident, we will take effective remedial measures in accordance with laws and regulations to prevent its escalation. We will notify you of such incidents through email, letter, telephone, and/or notification in a timely manner. If it is difficult to notify personal information subject, we will publish announcements in a reasonable and effective manner. In addition, we will proactively report to the regulatory authorities as required how such personal information security incident is handled.

4. How we provide your personal information to others

(1) Sharing

We will not share your personal information with other companies, organizations, or individuals, except under the following circumstances:

(a) Sharing with authorization or consent:

We will share your personal information with your designated third parties with your consent or authorization and within the scope of your authorization.

In addition to the scenario disclosed herein, if we need to share your personal information with other parties due to the need of conducting other business, we will expressly notify you of such sharing in accordance with applicable laws and regulations and ask for your authorization or consent.

(b) Sharing in statutory situations:

We may share your personal information with other parties in accordance with laws, regulations, regulatory rules or mandatory requirements by competent governmental authorities.

(c) Sharing with our operating institutions: personal information of your related persons may be shared within our operating institutions and our SMBC. We will only share necessary personal information, and the related party is bound by the stated purpose in the policy. The scope of personal information sharing will be determined according to the specific business situation, including submitting statistical information to the regulatory authority as required. For risk management and compliance with regulations of anti-money laundering and sanctions, the personal identity information of your related persons may be shared within our operating institutions and SMBC. If our operating institutions want to change the purpose of processing personal information, they will again seek your authorization and consent.

(d) Sharing with partners: in order to ensure the smooth completion of the services provided to you, our certain services will be provided by our partners (such as statement of account mailing services). We may share certain related persons' personal information with our partners to provide better services and experience. We will only share your personal information for legal, legitimate, and necessary purposes, and will only share personal information necessary to provide services. At the same time, we will in the form of a written agreement, request them to process the above information in accordance with our explanation, policy, and any other relevant confidentiality and security measures. Our partners have no right to use the shared personal information for any other purposes. If you refuse to share personal information collected by us for which the partners need to provide services, you may NOT be able to use our service.

(2) Transfer

We will not transfer your personal information to any other companies, organizations or individuals, except that:

(a) we have obtained your authorized consent. At the time, we will inform you of the purpose for the transfer and type of the recipient; where sensitive personal information is involved, we will also inform you of the type of sensitive personal information, the identity and security capabilities of the recipient, subject to your express prior consent or authorization.

(b) it accords with laws, regulations, or mandatory administrative or judicial requirements.

(c) in the case of mergers, acquisitions, asset transfers and other similar transactions, if it involves the transfer of personal information, we will request the new company or organization, which holds your personal information, to be bound by this Policy. Otherwise we will stop transferring personal information to such company or organization and ask the new company or organization to resolicit your authorization

(3) Public disclosure

We will publicly disclose related persons' personal information under the following circumstances:

(a) We will notify you of the purpose of disclosure of personal information and the type of personal information to be disclosed; where sensitive information is involved, you will also be informed of the contents of the sensitive information and your explicit consent will be obtained in advance

(b) We may publicly disclose the related persons' personal information in the event of mandatory requirements of legal, legal procedure, litigation or governmental agencies.

(4) Exceptions to obtaining authorization and consent

In accordance with applicable laws, regulations, and regulatory requirements, etc., **we may share, transfer, or publicly disclose your personal information without your authorized consent** when required by the state authorities or regulatory authorities, or for the purpose of adequately protecting your rights and interests, or under other reasonable circumstances as agreed herein under the following circumstances:

a. Directly related to national security or national defense security;

b. Directly related to public security, public health or significant public interests;

c. Directly related to criminal investigation, prosecution, enforcement of judgement and etc.;

d. For the protection of your or other individual's life, property, and other significant legitimate rights and interests, where it is difficult to obtain your or such individual's prior consent;

e. Collect or use your personal information that has been willingly disclosed to the public by you;

f. Collect or use personal information received from legally and publicly disclosed information, such as legitimate news reports, government information publication or other channels;

5. Your rights

In accordance with the applicable laws, regulations, and regulatory requirements of China, we guarantee your exercise of the following rights in connection with your personal information:

(1) Access to your personal information

Except as otherwise provided by laws and regulations, you have the right to access your personal information at SMBC's branches.

(2) Correction of your personal information

If you find any error in your personal information processed by us, you have the right to request us to make corrections. You can raise a correction application at SMBC's branches.

(3) Deletion of your personal information

Under the following circumstances, you can request us to delete your personal information at SMBC's branches:

(a) if our processing of personal information violates any law or regulation;

(b) if we collect or use your personal information without your consent;

- (c) if our processing of personal information breaches our agreement with you;
- (d) if you no longer use our products or services, or you cancel your account; or
- (e) if we no longer provide you with products or services.

When you delete information in our services, we may not immediately delete the corresponding information in our backup system, but we will delete that in a timely manner when the backup is updated.

(4) Changing your authorization scope

You may change your authorization scope or withdraw your authorization for the collection and use of the additionally collected personal information by deleting information, turning off device features on the device, in privacy settings, etc. You may also withdraw your authorization for the collection of the additionally collected personal information by canceling your account.

(5) Account cancellation

If you intend to cancel your personal bank account, you can apply at our sub-branches.

Please note that the account cancellation is irrevocable. Once you have canceled it, we will stop collecting, using, or publicly providing personal information about this account. However, we are required to store the information provided or generated by you during the period of using our services in accordance with the regulatory requirements and to cooperate with the inspections of regulatory authorities within the retention period.

(6) Obtaining a copy of personal information

If you would like to obtain a copy of the personal information you provided, you can contact us through the methods set forth in this policy and we will verify and handle your requests in a timely manner.

(7) Constraints of automatic decision making from information systems

In certain business functions, we may make decisions solely based on non-manual automatic decision mechanisms including information systems and algorithms. If these decisions significantly affect your legitimate interests, you have the right to ask for explanation and we will provide appropriate remedies.

(8) Responding to your above request

In order to ensure the security, related persons may need you to provide a written request and authorization letter. We may require you to verify related persons' identity before processing your request. For those unreasonably repetitive requests which need too excessive technical means, pose risks to others' legal rights, or are very impractical, we may reject such requests.

In accordance with laws, regulations or regulatory requirements, we will NOT be able to respond to your requests:

- a. Directly related to our performance of obligations under laws, regulations and regulatory requirements;**
- b. Directly related to national security or national defense security;**
- c. Directly related to public safety, public health or significant public interests;**
- d. Directly related to criminal investigation, prosecution, trial or enforcement of judgment and etc.;**
- e. There is sufficient evidence that you have subjective malice or abuse of rights;**
- f. For the protection of your, related persons' or other individual's life, property, and other significant legitimate rights and interests, where it is difficult to obtain your or such individual's prior consent;**
- g. Respond to your requests which may result in serious damage to the legitimate rights and interests of you, related persons or other individuals and organizations; or**
- h. Involve our trade secrets.**

Please note that if we decide not to respond to your requests, we will notify you of the reasons therefor

and provide you with the channel for filing a complaint.

6. How we process personal information of minors

A minor may not open a corporate account at SMBC for the products, websites and services in relation to SMBC's corporate business mainly targeted at enterprises, institutions, etc. However, some businesses may involve the collection of information from minors. In the case of collecting minors' information with the consent of parents or legal guardians, SMBC will only process minors' personal information when it is permitted by law, explicitly agreed by parents or legal guardians, and when it is necessary to protect minors. If we found that minor's personal information had been collected without the parents' prior consent for the corporate business, we will delete such information in a timely manner.

7. How your personal information is transferred globally

(1) Location of storage

In principle, the personal information we collect and generate within the territory of the People's Republic of China will be stored within the territory of the People's Republic of China.

(2) Retention period

a. We will limit the maximum retention periods of your personal information for the purpose of the business in this policy, except where there is a legally mandatory requirement to store it or where separate consent has been obtained from clients. Upon the expiration of such retention periods, we will delete or anonymize your personal information.

b. Regarding the length of retention period, we will refer to the following criteria, whichever is longer:

(i) The time necessary to complete the relevant services, to keep records of the services within a reasonable range, and to respond to your inquiries, investigations, complaints, or claims

(ii) The time necessary to ensure the service safety and quality;

(iii) The retention period you have agreed to; and

(vi) Other terms regarding the retention period.

(3) Cross-border transfers

We may provide your personal information to SMBC Group and/or its related contractors, subcontractors, agents, service providers, licensors, professional advisors, business partners, or affiliates of SMBC Group (including their employees, directors and officers), only for the purpose of our cross-border business' operations and unified management of overseas branches by overseas head office. We will inform you in advance of the purpose of cross-border transfer of your personal information, the type of personal information and use of methods of personal information, and obtain your separate consent, as well as carry out the necessary procedures in accordance with applicable laws and regulations.

"SMBC Group" in this policy means Sumitomo Mitsui Banking Corporation registered in Japan and/or any of its affiliates, subsidiaries, associated entities and any of their branches and offices, or any of them. "Members of SMBC Group" shall have the same meaning.

8. How we update this policy

1. If you refuse to consent to this policy, please stop using our products or service;

2. We reserve the right to update or modify this policy from time to time. The documents as amended will supersede all prior documents and take effect immediately after their publication through or at our official portal website, WeChat official account, and other channels. Please pay attention from time to time to the changes of relevant contents in relevant announcements and notices.

3. For significant changes, we also provide more noticeable notices (including for certain services, we will send a notification via email stating the specific changes to this policy).

Significant changes referred hereunder include but not limited to:

1) Major changes in our service and business modes, such as changes in relation to the purpose of processing personal information, the type of personal information processed and the way in which we use personal information is used;

2) Major changes in our ownership structure, organizational structure, etc., such as changes as result of business adjustments, bankruptcy, mergers, etc.;

3) Changes in the main objects of personal information sharing, transfer or public disclosure;

4) Major changes in your rights to participate in personal information processing of personal information and the way of you exercising such rights;

5) Changes in contact information or complaint channels responsible for personal information security; and

6) Personal information security impact assessment report indicates that there is a high risk.

4. If you do not agree to the new terms and conditions, you have the right to and shall stop using our services and products. If you continue to use our services and products, it is deemed that you agree to accept the updated terms and conditions.

5. These terms and conditions are written in Chinese, English and Japanese. In case of discrepancies, the Chinese version shall prevail.

9. How to contact us

If you have any questions, complaints or suggestions with respect to this Privacy Policy, please visit any of our branches or contact your account manager for further assistance. Upon receiving your questions, we will process them promptly and appropriately. In general, we will reply promptly, unless otherwise required by laws, regulations or regulatory agencies.

Company Name: Sumitomo Mitsui Banking Corporation (China) Ltd

Registered Address: 11 / F, 12 / F, 13 / F, Shanghai World Financial Center, 100 Century Avenue, China (Shanghai) Pilot Free Trade Zone

Contact Number: 021-3860-9000