



**兴业银行股份有限公司**  
**INDUSTRIAL BANK CO.,LTD.**

## **Key Points of Privacy Policy**

**Update date: October 8, 2023**

**Effective date: October 9, 2023**

## **Summary**

The Industrial Bank Co., Ltd. and its subsidiaries (hereinafter referred to as “IB”) are fully aware of the importance of personal information to their customers, and undertake to strictly comply with the *Data Security Law of the People’s Republic of China* and the *Personal Information Protection Law of the People’s Republic of China*. IB will follow the principles of legality, legitimacy, necessity and good faith in processing the information of individual customers, take corresponding security measures to protect personal information of customers, and spare no effort to provide customers with clear and understandable words in explanations and notifications. **IB highlights the provisions that may have a significant impact on your legitimate interests in this Key Points of Privacy Policy in bold to draw your attention.** In terms of specific products or services, the purposes, methods, scope, and retention periods of collecting and using your personal information may also be explicitly stated to you through respective product (or service) agreement, authorization letters, etc., and obtain your authorization or consent.

### **I. Scope of application**

This *Key Points of Privacy Policy* (hereinafter referred to as “this *Policy*”) is a general statement of IB and its subsidiaries on their customers’ personal information protection work, which is applicable to all business lines of IB, as well as all products and services provided to customers (hereinafter referred to as “you”), covering various channels such as counters, self-service devices, websites, apps, public accounts (including service accounts, subscription accounts, and mini-programs, etc.), and H5 pages.

### **II. Main channels for your complaints and reports**

If you have any questions, suggestions, complaints or reports regarding this *Policy*, you may contact the relevant personnel and team in charge of the protection of personal information through various channels, such as IB’s customer service hotline 95561, “Online Customer Service” of the official website ([www.cib.com.cn](http://www.cib.com.cn)), “IB Customer Service” of IB mobile banking APP, or the email of the person in charge of IB’s protection of personal information ([PII\\_Protection@cib.com.cn](mailto:PII_Protection@cib.com.cn)). IB will address your concerns, suggestions, complaints or reports promptly and properly.

**This *Policy* will help you understand the following information:**

**I. Definition**

**II. How does IB collect and use your personal information?**

**III. How does IB use the Cookie and other similar technologies?**

**IV. How does IB provide, transfer, and disclose your personal information to the public?**

**V. How does IB store and protect your personal information?**

**VI. How do you manage your personal information?**

**VII. How does IB deal with the information of the minors?**

**VIII. How does IB update this *Policy*?**

**IX. How to contact IB?**

## **I. Definition**

**1. Personal information:** It refers to various information (excluding the anonymized information after processing) recorded by electronic or other means that are related to identified or identifiable natural persons. Personal information includes but is not limited to name, gender, nationality, occupation, place of residence or affiliation, contact information, types, numbers, and expiration dates of ID cards or identification documents.

**2. Sensitive personal information:** It refers to the personal information that once is leaked or illegally used, it may easily lead to the infringement upon the dignity of natural persons or the endangerment of personal and property security. Sensitive personal information mainly includes: ID numbers, biometric identification information, religious beliefs, specific identities, medical health, financial accounts, property information, communication records and contents, and travel trajectories, etc., as well as the personal information of the minors under 14 years old.

## **II. How does IB collect and use your personal information?**

IB promises to adhere to the principles of specific purpose, openness and transparency, informed consent, minimal necessity, secure processing, and subject participation in collecting and using your personal information within the minimum scope necessary to achieve the purpose of the processing.

### **1. How does IB collect your personal information?**

IB collects your personal information through the following means:

(1) Personal information that you voluntarily provide when IB provides services for you;

(2) Information related to the services formed when IB provides financial services for you;

(3) Personal information necessary for providing you the services that IB collects, in accordance with the laws and administrative regulations, from natural and legal persons, as well as other organizations such as credit reporting agencies, credit management companies, and credit rating agencies that legally retain such information; or

(4) Information collected as stipulated by laws and regulations or by other means authorized by you.

### **2. How does IB use your personal information?**

(1) Personal information is used to identify and verify your identity, as well as to approve, manage, and deal with transactions that you request or authorize;

(2) IB provides you with financial products or services that you have authorized to use, and then uses such information to maintain and improve the aforementioned business functions;

(3) When IB provides you with financial services, you authorize it to continue collecting and using your information. When you cancel the services, IB will stop collecting your relevant personal information, unless otherwise provided by laws and regulations;

(4) IB may analyze relevant data of products or services to enhance your experience or to prevent risks. These data will not contain any of your personally identifiable information, unless you have authorized so or unless it is otherwise required by laws, administrative regulations and rules;

(5) Personal information used by IB is to protect your fund security;

(6) IB may send you notifications containing commercial information to help you better understand its products and services; and

(7) Personal information is used for other purposes that you have authorized, as well as those permitted by laws and regulations.

### **3. Special tips for sensitive personal information**

IB collects, processes and protects your sensitive personal information in accordance with the law. IB only processes your sensitive personal information for a specific purpose and with sufficient necessity in providing you the relevant products and services, and with your separate consent and strict protective measures.

### **4. Other instructions**

All IB products (or services) will inform you of the specific purpose, method, type and scope of collecting and processing the personal information, as well as the retention period of such information. IB will obtain your authorization or consent in accordance with the requirements of laws and administrative regulations through the *Articles of Association*, the *Authorization of Personal Information Processing* or the *Privacy Policy* corresponding to the products (or services). If an IB product (or service) may require to collect and process the personal information of a minor under 14 years old, the relevant processing rules will be specially explained in the product (or service), and the consent of the parents or other guardians of the minor will be obtained.

## **III. How does IB use Cookies and similar technologies?**

### **1. Cookies**

To ensure the proper functioning of the website, IB will store small data files named Cookies on your computer or mobile device. This helps IB verify your identity, reduce the number and frequency of entries, or determine the security status of your account. Cookies usually contain identifiers, site names, and numbers and characters. IB will not use Cookies for any purpose other than those stated in the *Policy*. You may manage or delete Cookies according to your preferences. You may also clear all Cookies saved on your computer or mobile device, and most web browsers have the

function to block Cookies. If you do so, however, you need change your user settings each time when you visit the IB system.

## **2. Do Not Track**

Many web browsers have a “Do Not Track” function that allows you to send “Do Not Track” requests to websites. If you have enabled the “Do Not Track” function in your browser, the IB website will respect your choice.

## **IV. How does IB provide, transfer and disclose your personal information?**

### **1. Provision of the information for the public**

IB will not lease, sell or provide your personal information to any third parties for the purposes other than the completion of the transaction/service, unless otherwise provided by laws and regulations.

#### **(1) Entrusted information processing**

Some of the functions or modules in IB’s relevant products are provided by external suppliers. If IB entrusts a third party to process your personal information, it will conduct security assessment on the entrusted party and the entrusting behaviors, sign the entrustment agreement with that party to specify the purpose, duration, processing method, type of personal information, protection measures, as well as the rights and obligations of both parties. However, the entrusting behaviors shall not exceed the scope of authorization. IB will continuously supervise the personal information processing activities of the entrusted party and urge the latter to delete your personal information in time after the termination or cancellation of the entrusted matter.

#### **(2) Information sharing**

Except with your separate consent, IB will not provide your personal information to any enterprises, organizations or individuals unless otherwise provided by laws and regulations. With your separate consent, IB will only provide your personal information for legal, justified, necessary and specific purposes, and will only provide such information necessary for the service, unless otherwise provided by laws and regulations. IB will require the recipient to process your personal information in strict compliance with relevant laws and regulations and the *Policy*.

### **2. Information transfer**

In accordance with laws, regulations and business practices, if the transfer of personal information is involved in such transactions as mergers, acquisitions, and asset transfers, etc., IB will inform you of the name and contact information of the recipient and require the recipient to continue to be bound by this *Policy*, otherwise, IB will require the recipient to re-obtain your consent.

### **3. Information disclosure**

In principle, IB will not disclose your information publicly. If it is necessary to disclose the information in public, IB will obtain your express consent, unless otherwise provided by laws and regulations.

## **V. How does IB store and protect your personal information?**

## **1. Information storage**

(1) Personal information collected and generated by IB within the territory of the People's Republic of China will, in principle, be stored within the territory of the People's Republic of China.

If it is necessary to provide your personal information outside the People's Republic of China, on the premise of meeting statutory conditions, IB will inform you of the name, contact information, processing purpose and method, type of personal information of the recipient outside China, as well as the method and procedures for exercising your rights to the recipients outside China. And only after obtaining your separate consent will your personal information be provided to a recipient outside China, unless otherwise stipulated by laws and regulations.

IB will take necessary measures to ensure that the activities of the recipient outside China in processing your personal information meet the standards for protecting such information stipulated in the *Personal Information Protection Law of the People's Republic of China*. You may obtain specific information in the *Articles of Association*, the *Authorization of Personal Information Processing* or the *Privacy Policy* corresponding to the relevant product (or service).

(2) IB will keep your personal information in accordance with the laws and regulations, this *Policy* and the period agreed with you. Unless otherwise provided by laws and regulations, your personal information will be retained for a minimum period of time necessary for the processing purpose. Upon expiration of the retention period, IB will delete or anonymize your personal information in accordance with Article 6(3) of this *Policy*.

## **2. Information protection**

(1) IB actively implements the requirements of national laws, regulations and industrial norms, formulates and puts into effect the security requirements covering the whole life cycle of personal information, such as data collection, transmission, storage, use, sharing and deletion. IB has developed a sound mechanism for risk investigation, emergency response, supervision and inspection, controlled and audited the scope of inquiry authorization on personal information in strict accordance with the principle of minimum necessity, adopted technical measures such as encryption and de-identification to prevent the theft and access of ultra vires to personal information, and established its sound network attack protection and monitoring, and disposal capabilities. IB makes its every effort to prevent unauthorized access, public disclosure, use, modification, damage or loss of personal information, and voluntarily accepts the supervision of relevant state regulatory authorities.

(2) IB has established a sound emergency response mechanism for incidents of personal information security. If such incident occurs, IB will, in accordance with the laws and administrative regulations, post public notices or inform individuals who might be affected in a reasonable and effective manner. In addition, IB will take all feasible measures to minimize the adverse impact on you and promptly report the handling of such incidents to the regulatory authorities in accordance with the relevant regulations.

**Attention:** Although IB has taken security and effective measures and

implemented the standards stipulated by laws and regulations, please understand that **unforeseen situations that IB cannot reasonably foresee, prevent, avoid or control may occur as a result of potentially malicious attacks and force majeure factors. Therefore, IB strongly recommends that you take proactive measures to protect your personal information security, including but not limited to using more complex passwords and not disclosing your personal account passwords and sensitive information to others.**

## **VI. How do you manage your personal information?**

IB strictly complies with the laws, regulations and regulatory requirements, fully guaranteeing customers' rights to control their personal information. The scope and provision of exercising such rights include:

### **1. To access to your personal information and obtain a copy of your personal information**

You are authorized to access to your personal information and obtain a copy of your personal information through the IB's official website ([www.cib.com.cn](http://www.cib.com.cn)), mobile banking and other online channels, unless otherwise provided by laws and regulations. IB will verify your identity before you access to your personal information and obtain a copy of your personal information. For specific operation steps, please refer to IB's *Privacy Policy* or *Operation Manual* of specific products (or services).

### **2. To correct and update your personal information**

If you find that your personal information is inaccurate or incomplete, you have the right to request IB (or through IB's official website, mobile banking, and other online channels) to correct and update your personal information. IB will verify your identity before you correct and update your personal information. For specific operation steps, please refer to IB's *Privacy Policy* or *Operation Manual* of specific products (or services).

### **3. To delete your personal information**

You may request IB to delete your personal information through its branches, official website, customer service hotline (95561) and other channels.

You may request IB to delete your personal information under the following circumstances:

- (1) The purpose of information processing has been achieved, cannot be achieved, or is no longer necessary to achieve the purpose of the processing;
- (2) IB will no longer provide you with the products or services, or the retention period has expired;
- (3) You have withdrawn your consent;
- (4) IB violates the laws and regulations or the agreement in the processing of personal information; or
- (5) There are other circumstances stipulated by laws and regulations.

If the retention period provided by laws and administrative regulations has not expired, or if it is technically difficult to achieve the result of deleting your information, IB will cease processing the matter other than storing it and taking the necessary security measures.

**Please understand that the completion of each business function requires some basic personal information. When you delete some personal information, we will not continue to provide you with the corresponding services, and no longer process your deleted personal information.** However, your decision to delete the personal information will not affect the previous processing of personal information based on your consent.

#### **4. To change the scope of your authorized consent or to withdraw your consent**

You may change or withdraw your authorized consent to the collection and use of personal information for the purpose of enhancing the experience of an IB product or service at any time. For specific operation steps, please refer to IB's *Privacy Policy* or *Operation Manual* of specific products (or services).

**Please understand that the completion of each business function requires some basic personal information. When you change the scope of your authorized consent or withdraw your consent, we will not continue to provide you with the corresponding services, and no longer process your corresponding personal information.** However, your decision to change the scope of your authorized consent or withdraw your consent will not affect the previous processing of personal information based on your consent.

#### **5. To constrain automatic decision-making functions within the information system**

IB undertakes to ensure the transparency of decision-making and the fairness and impartiality of results when using your personal information to make automatic decision-making, and provide you with convenient rejection methods when pushing the information and commercial marketing through automatic decision-making. For specific operation steps, please refer to IB's *Privacy Policy* or *Operation Manual* of specific products (or services).

#### **6. How do you cancel your account?**

As for the channels for cancelling your account or deleting your personal data on your own initiative in specific products (or services), IB will explain you the operation steps of doing so in the corresponding *Privacy Policy* or *Operation Manual* of specific products (or services).

#### **7. How does IB respond to your above-mentioned requests?**

If you have any questions, advice or suggestions about this *Policy*, you may report them to IB. You might be required to provide us a written request for the fulfillment of statutory obligations and security protection. **IB may ask you to verify your identity before processing your requests.** It will process your requests within 15 days after receiving your feedback and verifying your identity.

Despite the above agreements, **IB could not respond to your requests under any of the following circumstances according to the laws and regulations:**

- (1) Your requests are concerned with IB's obligations in accordance with laws and regulations;
- (2) Your requests are directly related to national security and defense security;



(3) Your requests are directly related to public safety, public health or major public interests;

(4) Your requests are directly related to criminal investigation, prosecution, adjudication, or the enforcement of judgment, etc.;

(5) IB has sufficient evidence to prove that your requests are subjectively malicious or abuse of rights;

(6) Your requests involves the information that IB uses for the purpose of protecting your or other individuals' significant legitimate rights and interests involving the life or property issue, but it is difficult to obtain the authorization and consent of the person concerned;

(7) It would result in serious harm to your, other individuals' or organizations' legitimate rights and interests if IB responds to your requests;

(8) Your requests are concerned with trade secrets; or

(9) There are other circumstances stipulated by laws and regulations that IB should not respond to your requests.

## **VII. How does IB deal with the information of the minors?**

1. IB's products and services mainly focus on adults. Before registering your accounts and using such products and services, **please read this *Policy* together with, and under the guidance of your parents or other guardians, and use IB's services or provide information to IB with their consent** if you are **a minor between 14 years old and 18 years old**. IB will process the personal information of minors in accordance with the laws and regulations, this *Policy* and the agreement with the guardians of the minors, and strictly fulfill its responsibility for protecting the personal information of minors.

2. If you are **under 14 years old** and wish to register and use the relevant products and services of IB, you should inform your parents or other guardians, and obtain the prior consent of your parents or other guardians in advance. IB treats your personal information as the sensitive one, and has formulated separate rules for the processing of personal information in accordance with the laws and regulations. **For more details, please refer to the *Rules of the Industrial Bank on the Protection of Children's Personal Information* corresponding to the respective products (or services).**

If you are the parent or other guardian of a **minor under 14 years old**, and when you have questions about the processing of the information about the minor under your guardianship, **please contact IB through the contact information agreed upon in this *Policy* or in the *Rules of the Industrial Bank on the Protection of Children's Personal Information* corresponding to the respective products (or services).**

## **VIII. How does IB update this *Policy*?**

In accordance with changes in national laws and regulations, regulatory requirements and the needs of business development, IB will update this *Policy* and related rules from time to time, **and the updated content will be announced through IB's official website ([www.cib.com.cn](http://www.cib.com.cn)) and other public channels and to**

**seek your authorization again.** You should pay attention to the relevant announcement as the updated *Policy* is effective from the date of publication. **You understand and acknowledge that you should immediately stop using the relevant products or services if you do not agree with the updated content; and IB will properly process your personal information in accordance with the laws and regulations, this *Policy* and the agreement with you. If you continue to use the services, you are deemed to have agreed to accept the updated content.**

## **IX. How do you contact IB?**

If you have any questions, suggestions, complaints or reports on this *Policy*, you may contact IB's personnel and team in charge of personal information protection through any of the following channels: the customer service hotline 95561, the "Online Customer Service" column on the official website ([www.cib.com.cn](http://www.cib.com.cn)), the "IB Customer Service" column of the IB Mobile Banking, or the email of IB's personnel in charge of personal information protection ([PII\\_Protection@cib.com.cn](mailto:PII_Protection@cib.com.cn)). IB will handle your request(s) as soon as possible, and will respond within 15 days after verification of your user identity.

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