



**FusionBank**  
富融銀行

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**PRIVACY  
POLICY  
STATEMENT**

## **Fusion Bank Limited**

### **Privacy Policy Statement**

The protection of your privacy is our top priority. At all times we will comply with the Personal Data (Privacy) Ordinance (Cap. 486) ("**Ordinance**"). Whether you are a current customer or just visiting our website and/or mobile phone application ("**Mobile App**"), we safeguard the information you voluntarily provide to us. We only collect necessary personal data from customers or prospective customers for the provision and marketing of Facilities, Products and Services. Any collected personal data will only be used for the purposes specified and not for other purposes except with the consent of the customers or prospective customers. All practicable steps will be taken to ensure customers and prospective customers' personal data is kept secure, confidential and accurate. Such data will not be retained for longer than is necessary. Only authorised personnel can access or process this personal data. Subject to the "Personal Data Retention" section below, customers or prospective customers have the right to request access to, correction of and/or deletion of their personal data (where applicable).

### **Types of Personal Data Held**

Two broad categories of personal data are held by us. They comprise personal data as set out below:

*a) Customers or Prospective Customers' Personal Data:*

This includes the data or information which is necessary in connection with the opening or continuation of accounts and the establishment, provision or continuation of Facilities, Products and Services, including but not limited to biometric data and other identification information.

*b) Our Employees' Personal Data or the Data Collected from our Job Applicants:*

This includes but is not limited to the name, identification documents, contact information, educational background and curriculum vitae of employees and job applicants.

### **Purposes of Data Collection**

1. In relation to customers or prospective Customers ("**data subjects**"), data is used for:
  - (i) considering and processing applications for Facilities, Products and Services;
  - (ii) meeting our internal operational requirements (including system or product development, training, optimisation and planning purposes);
  - (iii) the operation, maintenance and provision of Facilities, Products and Services;
  - (iv) conducting credit checks at the time of application for credit or banking facilities and at the time of regular or special reviews;

- (v) creating and maintaining the Bank' s credit and risk scoring models and other models used in connection with the Facilities, Products and Services;
- (vi) assisting other financial institutions to conduct credit checks and collect debts;
- (vii) ensuring ongoing credit worthiness of data subjects;
- (viii) designing, optimising and maintaining Facilities, Products and Services and internal systems;
- (ix) determining amounts owed by or to or guaranteed or secured by data subjects;
- (x) conducting insurance claims or analysis;
- (xi) credit assessment, risk assessment or statistical analysis (including behaviour analysis) by the Bank or any of its Affiliates;
- (xii) creating and maintaining a credit history and transaction history of data subjects (whether or not there exists any relationship between data subjects and the Bank) for present and future reference of the Bank;
- (xiii) analysing which data subjects access and use the Facilities, Products and Services, and how and where data subjects access and use the Facilities, Products and Services, including Facilities, Products and Services available on the Bank' s websites, and apps, and through the use of artificial intelligence by the Bank from time to time;
- (xiv) advertising and marketing services, products and other subjects (including in connection with direct marketing subject to data subjects' consent as detailed in paragraph 6 of our ***Notice to Customers & Other Individuals relating to the Personal Data (Privacy) Ordinance***);
- (xv) the enforcement of data subjects' obligations, including without limitation the collection of amounts outstanding from data subjects and those providing security or guarantee for data subjects' obligations, and those data subjects providing security or guarantee;
- (xvi) meeting obligations, requirements or arrangements, whether compulsory or voluntary, of the Bank or any of its Affiliates to comply with, or in connection with:
  - (a) any Law within or outside Hong Kong existing currently and in the future (e.g. the Inland Revenue Ordinance (Cap. 112) and its provisions including those concerning automatic exchange of financial account information);
  - (b) any guidelines, guidance or requests given or issued by any Regulatory Authority within or outside Hong Kong existing currently and in the future and any international guidance, internal policies or procedures (e.g. guidelines or guidance given or issued by the Inland

Revenue Department including those concerning automatic exchange of financial account information);

- (c) any present or future contractual or other commitment with local or foreign Regulatory Authorities or any of their agents with jurisdiction over the Bank or any of its Affiliates that is assumed by, imposed on or applicable to the Bank or any of its Affiliates;
  - (d) any agreement or treaty between Regulatory Authorities; or
  - (e) monitoring compliance with Law or agreements with or requirements of any Regulatory Authority by the Bank or any of its Affiliates;
- (xvii) complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the Bank and its Affiliates and/or any other disclosure and use of data and information in accordance with any programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions and/or any acts or attempts to circumvent or violate any Laws relating to these matters and/or other internal policies and procedures of the Bank or its Affiliates;
  - (xviii) facilitating the Bank or any of its Affiliates to comply with and monitor compliance with Laws relating to or in connection with the detection, investigation and prevention of money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions and/or any acts or attempts to circumvent or violate any Laws relating to these matters and/or other internal policies and procedures of the Bank or its Affiliates;
  - (xix) facilitating the Bank or any of its Affiliates to comply with and monitor compliance with any demand or request from the Regulatory Authorities;
  - (xx) enabling an actual or proposed assignee of the Bank or any of its Affiliates, or participant or sub-participant of the rights of the Bank or any of its Affiliates in respect of the data subject to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation;
  - (xxi) exchanging information with merchants accepting Cards issued by the Bank (each a "**Merchant**" ) and co-branding partners;
  - (xxii) verifying data subjects' identities with any Card acquirer of a Merchant in connection with any Card transactions;
  - (xxiii) handling claims from third parties that there has been a violation of their intellectual property rights or their right to privacy; and

(xxiv) purposes relating thereto.

2. Our employees and job applicants' data is used for:

- (i) recruitment; and
- (ii) other employment-related purposes, including but not limited to, selection, qualification assessment, employer reference, remuneration determination and other employment opportunities.

To comply with the requirements of the Ordinance, on or before we collect personal data, we will notify our customers/prospective customers/employees/job applicants of the purposes for collecting such data, the classes of persons to whom the data may be transferred, their rights to both access and correct their data and other relevant information.

For details on use and disclosure of customers/prospective customers' personal data, please read our ***Notice to Customers & Other Individuals relating to the Personal Data (Privacy) Ordinance***.

### **Personal Data Security**

We take all reasonably practicable means to protect data, such as by restricting data access to authorised personnel only and incorporating security measures into equipment where data is stored. Encryption is employed for sensitive data transmission. If we engage data processors to process personal data on our behalf (whether within or outside Hong Kong), we adopt contractual or other means of protection to prevent any personal data transferred to the data processor from being kept longer than is necessary for processing of the data, and prevent any unauthorised or accidental access, processing, erasure, loss or use of the data transferred to the data processor for processing.

### **Personal Data Retention**

The collected personal data will not be kept longer than necessary for the fulfillment of the purposes for which the personal data are or are to be used at the time of collection, and for compliance with Laws from time to time. We shall continue to hold data relating to customers after the closure of account(s) / termination of service(s) for such period as prescribed by Laws.

### **Personal Data Disclosure**

For details about the possible classes of transferees for our customers/prospective customers' data, please refer to our ***Notice to Customers & Other Individuals relating to the Personal Data (Privacy) Ordinance***. We will not disclose, share, sell or divulge your data to other external parties unless we have obtained your consent, or are required to do so by Law.

### **Revision of Privacy Policy Statement**

This Privacy Policy Statement is subject to review and change from time to time. Please visit the Mobile App for the latest version of this Privacy Policy Statement.

### **Data Access Requests, Data Correction & Data Deletion Requests**

Subject to the "Personal Data Retention" section above, you have the right to access, correct and/or delete your personal data. Any requests for access to data, correction of data and/or deletion of data or questions about this Privacy Policy Statement should be addressed to:

*The Data Protection Officer,  
Fusion Bank Limited,  
2/F, InnoCentre,  
72 Tat Chi Avenue, Kowloon Tong, Kowloon, Hong Kong  
Email address: [dpo@fusionbank.com](mailto:dpo@fusionbank.com)*

Subject to your consent, the Bank may use or provide your personal data to any of its Affiliates for the purpose of direct marketing, as described in paragraph 6 of our ***Notice to Customers & Other Individuals relating to the Personal Data (Privacy) Ordinance***. If you do not wish us to do so, please contact the Data Protection Officer in writing at [dpo@fusionbank.com](mailto:dpo@fusionbank.com) with your name and account number stated (if applicable). No fee will be charged. For any enquiries, please email [customerservice@fusionbank.com](mailto:customerservice@fusionbank.com).

### **Definitions**

In this Privacy Policy Statement:

"Bank" means Fusion Bank Limited, a company incorporated in Hong Kong with limited liability and authorised as a licensed bank under the Banking Ordinance (Cap. 155), including its successors, assigns, transferees and any persons deriving title under it;

"Affiliates" means, in relation to the Bank, any subsidiary of the Bank and any holding company thereof and any subsidiary of any such holding company;

"Card" means an ATM card, a debit card, a credit card, or a revolving card or all of them, as the context requires;

"Facilities, Products and Services" means products, services or facilities offered or to be offered by or through the Bank (which may include banking, Cards, financial, insurance, fiduciary, securities and/or investments products and services and banking credit facilities as well as products, services and facilities relating to these, subject to obtaining the relevant regulatory approvals in Hong Kong or elsewhere);

"Hong Kong" means the Hong Kong Special Administrative Region of the People's Republic of China;

"Law" means all relevant or applicable laws, statutes, regulations, treaties, agreements, guidelines, guidance, directives, practice notes, practices, information papers, rules, bye-laws, decrees, codes, circulars, notices, requests, disclosures requirements or other similar documents issued or given by any Regulatory Authority, governmental, intergovernmental or supranational body, agency, department, or legal, regulatory or self-regulatory, tax, law enforcement or other similar authority, agency or organisation, or stock exchange, market, clearing house, trading registration or depository, or industry body or association of banking or financial services providers, and court orders (including those which the Bank or any of its Affiliates is subject to or is expected to comply with), whether or not having the force of law and whether within or outside of Hong Kong; and

"Regulatory Authority" means any government or any governmental agency, semi-governmental or judicial entity or authority, regulatory authority, including any stock exchange or any self-regulatory organisation established under statute.

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