

# 职位申请人及实习生个人信息保护政策

## Personal Information Protection Policy

### for Job Applicant and Intern

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本个人信息保护政策（“**本政策**”）适用于恒生银行（中国）有限公司（“**恒生**”或“**我们**”）的职位申请人及实习生（统称“**个人信息主体**”或“**您**”）。请您在向我们提供个人信息前仔细阅读本政策。

The Personal Information Protection Policy ( “this Policy” ) is applicable to job applicants and interns (referred to below as “you/ Personal Information Subject”) of Hang Seng Bank (China) Limited ("Hang Seng", "the Bank", "we" or "us") . Please read through this Policy carefully before you provide personal information to us.

**注意: 若您不同意本政策的相关条款, 请勿提交您的个人信息。请特别注意本政策通过加粗和/或下划线标注的部分。**

**Notice: If you do not agree on the following provisions stated in this Policy, please do not submit your personal information, and also pay attention to the provisions that are bolded and/or underlined.**

本政策包括以下内容

The table of content of this Policy is set out as below:

1. 我们如何保护您的个人信息  
**How We Protect Your Personal Information**
2. 我们如何收集您的个人信息  
**How We Collect Your Personal Information**
3. 我们如何使用您的个人信息  
**How We Use Your Personal Information**
4. 我们如何储存您的个人信息  
**How We Store Your Personal Information**
5. 我们向谁披露您的个人信息  
**To Whom We Disclose Your Personal Information**
6. 信息处理的特殊情形  
**Special Circumstances for Information Processing**
7. 我们如何使用 Cookies 及其他技术  
**How We Use Cookies and Other Technologies**
8. 您的个人信息相关权利  
**Your Rights Relating to Personal Information**
9. 如何联系我们  
**How to Contact Us**
10. 本政策的更新及其他  
**Updated of this Policy and Others**

## 一、 我们如何保护您的个人信息

### How we Protect Your Personal Information

(1)信息安全是我们的首要关切。我们将在任何时候竭力保障您的个人信息不被擅自或意外取得、处理或毁损。我们采取各种合适的安全技术和安全管理等措施保护您的个人信息，以实现我们对信息安全的承诺。如果由于我们的原因导致您的个人信息被非授权访问、公开披露、篡改或毁坏，导致您的合法权益受损，我们将依法承担相应的法律责任。

Information security is our top priority. We will endeavor at all times to safeguard your personal information against unauthorized or accidental access, processing or damage. We maintain this commitment to information security by implementing appropriate security and managerial measures to secure your personal information. We will take responsibility in accordance with the law if your information suffers from unauthorised access, public disclosure, tampering or damage for a reason attributable to us and so impairs your lawful rights and interests.

(2)我们设有严格的安全系统，以防止未经授权的任何人获取您的个人信息。我们对可能接触到您的信息的员工采取了严格管理，包括但不限于对不同岗位采取不同的权限控制，与相关员工约定保密义务，制定、实施有关信息保密与安全的规章制度并提供相关培训。

We maintain strict security systems to prevent unauthorized access to your personal information. We exercise strict management over our staff members who may have access to your information, including but not limited to access control applied to different positions, contractual obligation of confidentiality agreed with relevant staff members, formulation and implementation of information security related policies and procedures, and information security related training offered to staff.

(3)除非是为了遵守法律法规或监管规定，根据本政策、相应的另行协议约定（如有）或基于您的另行单独同意或授权行事，我们不会向任何第三方披露您的个人信息。当我们需要使用外部服务机构/人士提供的服务时，我们也会与其约定严格的保密义务，要求他们对您的个人信息采取保护措施并严格遵守适用的法律法规要求来处理个人信息

We will not disclose your personal information to any third party, unless the disclosure is made to comply with law, regulations or regulatory requirements or according to this Policy or separate agreement between us or based on your separate consent or authorization. When we use services provided by external service providers (entities or individuals), we also impose strict confidentiality obligations on them and require them to take all data protection measures required pursuant to applicable laws and regulations when processing your personal information.

(4)对于您的信息安全，您与我们同样负有重要责任。您应妥善保管您的个人信息，例如您的账户信息、身份验证信息（如用户名、密码及其他动态口令、验证码等），包括与之相关或可能记录该等信息的文件、设备或其他介质，并应只在安全的环境中使用该等信息及相关文件、设备或其他介质。在任何时候，您均不应向任何他人透露或允许任何他人使用该等信息或相关文件、设备或其他介质。如您认为您的个人信息及/或相关文件、设备或其他介质已经泄露、遗失或被窃，或发生其他可能影响信息安全的情形，您应立即通知我们以便采取适当措施防止损失扩大。

For the security of your personal information, you take on the same responsibility as us. You shall properly take care of your personal information, such as your account information, identity verification information (e.g. user name, password, dynamic password, verification code, etc.), and all the documents, devices or other media that may record or otherwise relate to such information, and shall ensure your personal information and relevant documents, devices or other media are used only in a secured environment. You shall not, at any time, disclose to any other person or allow any other person to use such information and relevant documents, devices or other media. Once you think your personal information and/or relevant documents, devices or other media have been disclosed, lost or stolen, or may otherwise affect your information security, you shall notify us immediately so that we may take appropriate measures to prevent further loss from occurring.

(5)若不幸发生个人信息安全事件，我们会启动应急预案，采取相应的处置和补救措施，防止事件升级、损失扩大。同时，我们将按照法律法规的要求向您告知：安全事件的基本情况和可能的影响、我们已采取或将要采取的处置措施、您可自主防范和降低风险的建议、适用的补救措施等。我们将及时将事件相关情况以邮件、信函、电话、短信、推送通知或其他合适的方式告知您。难以逐一告知个人信息主体时，我们会采取合理、有效的方式发布公告。同时，我们还将按照法律法规以及权力机关的要求，向权力机关报告个人信息安全事件及其处置情况。

If unfortunately, personal information security incident occurs, we will adopt emergency plan and take relevant actions and remediation measures to mitigate the severity and losses in connection therewith. Meanwhile, we will inform you of the basic information of the security incident and its possible impact, the actions and measures we have taken or will take, suggestions for you to prevent and mitigate the risk, and applicable remediation measures in accordance with the applicable requirements of law and regulation. We will inform you about the security incident by email, mail, call, SMS, push notification or through other methods as appropriate in a timely manner. Where it's difficult to notify each Personal Information Subject, we will post public notice in a reasonable and effective way. Meanwhile, we will report to the regulators such personal information security incident and our actions in accordance with applicable law, regulations and authority requirements.

## 二、 我们如何收集您的个人信息

### How We Collect Your Personal Information

(1) 个人信息是指以电子或者其他方式记录的与已识别或者可识别的自然人有关的各种信息，不包括匿名化处理后的信息。个人信息包括姓名、出生日期、身份证件信息（身份证、护照等）、个人生物识别信息、通信通讯联系方式、住址、账户信息、财产状况、位置信息等。

Personal information refers to any kind of information related to an identified or identifiable natural person as electronically or otherwise recorded, excluding information that has been anonymized. Personal information include name, birth date, ID certificate information (ID card, passport and etc.,), personal biometrics recognition information, contact information, address, account information, property status, location and etc.

敏感个人信息是一旦泄露或者非法使用，容易导致自然人的人格尊严受到侵害或者人身、财产安全受到危害的个人信息，包括生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息，以及不满十四周岁未成年人的个人信息。Sensitive personal information refers to personal information that, once leaked or illegally used, will easily lead to infringement of the human dignity or harm to the personal or property safety of a natural person, including biometric recognition, religious belief, specific identity, medical and health, financial account, personal location tracking and other information of a natural person, as well as any personal information of a minor under the age of 14.

敏感个人信息处理活动对您个人权益影响重大，一旦泄露或者非法使用将可能对您的人身及财产安全造成危害。我们将按照法律法规、监管规定及与您的约定开展信息处理行为，并采取相应的安全措施保护您的个人信息。如果您不提供相关敏感个人信息，我们将无法与您订立协议、对您进行背景调查核实等。

Sensitive personal information processing activities have a significant impact on your personal rights and interests. Once leaked or illegally used, it may cause harm to your personal and property safety. We will carry out information processing activities in accordance with laws, regulations, regulatory provisions and agreements with you, and take corresponding security measures to protect your personal information. If you do not provide relevant sensitive personal information, we will not be able to enter into an agreement with you, conduct background checks and verification on you, etc.

(2) 我们可能需要收集的个人信息

### Personal Information We May Need to Collect

a) 当您申请我们职位（非实习生职位）时，我们将根据您的授权或同意收集您的下述个人信息：

When you apply for our position (non-intern position), we will collect your information below upon your authorization or consent:

目的或功能	我们可能需要收集的信息	处理方式
评估、管理职位申请； 与您进行职位申请相关 的联络、沟通； 背景核查	<p>（1）个人身份信息，包括个人姓名、国籍、身份证件种类、号码及有效期限、简历、教育背景及证明文件、工作经历及证明文件、联系方式、住址、离职前月薪和其他报酬。</p> <p>（2）为了处理职位申请以及符合法律法规要求而获取的其他信息，如：背景调查结果、推荐人及其联系方式、是否存在既有/潜在利益冲突、与我们之间的通信和其他通讯记录（录音录像、通话记录、通信记录和内容）、关联亲属/密友的姓名/工作单位/职务信息（仅适用关联招聘的情况）。</p>	收集、存储、使用、传输、提供、删除

Purposes or Functions	Personal Information We May Need to Collect	methods of processing
To assess and process your application for employment; to conduct background vetting	<p>(1) Personally identifiable information, including name, nationality, type/number/validity period of ID certificate, resume, education background and supporting documents, working experience and communicate with you supporting documents, contact information, place of residence, the most recent monthly salary of application; to conduct last employment and other remuneration.</p> <p>(2) Any other personal information acquired or kept during the job application process or for the compliance of laws/regulations, e.g. <b>Background vetting results, referees and their contact information, existing/potential conflicts of interests, correspondence and other communication with us (audio and video records, call log, correspondence and its content), personal information of connected relationships, including name, employer' name and position title (the connected relationship information herein is only applicable to connected hire).</b></p>	collect, store, use, transfer, provide, delete

上述信息系为了处理您的职位申请所必需。如您未能提供所要求的信息（或提供的信息不完整、不准确或不真实），我们可能无法处理您的职位申请。

The above information is the basic information we must collect to process your job application. We may be unable to process your job application if you refuse to provide such information (or the information so provided is incomplete, inaccurate or untrue),

当您的职位申请成功并且成为我们的正式员工后（不包括实习生），您的个人信息将适用《职员个人信息保护政策》进行处理。

**When your job application is successful and you become our employee (excluding interns) , your personal information will be processed in accordance with the " Personal Information Protection Policy for Employee."**

b) 当您申请我们的实习生职位时，我们将根据您的授权或同意收集您的下述个人信息：

When you apply for our intern position, we will collect your information below upon your authorization or consent:

目的或功能	我们可能需要收集的信息	处理方式
评估、管理职位申请；与您进行职位申请相关的联络、沟通；背景调查核实	(1) 个人身份信息，包括个人姓名、国籍、身份证件种类、号码及有效期限、简历、教育背景及证明文件、工作经历及证明文件、联系方式、住址。 (2) 为了处理职位申请以及符合法律法规要求而获取的其他信息，如：背景调查结果、推荐人及其联系方式、是否存在既有/潜在利益冲突、与我们之间的通信和其他通讯记录（录音录像、通话记录、通信记录和内容）、关联亲属/密友的姓名/工作单位/职务信息（仅适用关联招聘的情况）。	收集、存储、使用、传输、提供、删除

Purposes or Functions	Personal Information We May Need to Collect	methods of processing
To assess and process your application for employment; to communicate with you in relation to your application; to conduct background vetting	(1) <b>Personally identifiable information, including name, nationality, type/number/validity period of ID certificate, resume, education background and supporting documents, working experience and supporting documents, contact information, place of residence.</b> (2) Any other personal information acquired or kept during the job application process or for the compliance of laws/regulations, e.g. <b>Background vetting results, referees and their contact information, existing/potential conflicts of interests, correspondence and other communication with us (audio and video records, call log, correspondence and its content), personal information of connected relationships, including name, employer' name and position title (the connected relationship information herein is only applicable to connected hire).</b>	collect, store, use, transfer, provide, delete

上述信息系为了处理您的职位申请所必需。如您未能提供所要求的信息（或提供的信息不完整、不准确或不真实），我们可能无法处理您的职位申请。

**The above information is the basic information we must collect to process your job application. We may be unable to process your job application if you refuse to provide such information (or the information so provided is incomplete, inaccurate or untrue).**

当您成为我们的实习生后，我们会将上述职位申请过程中已获取的个人信息进一步用于管理您与我们之间的实习关系，此外

还将根据您的授权或同意进一步收集您的下述个人信息：

When you become our intern, we will further use the personal information obtained during the above job application process to manage your internship relationship with us. In addition, we will further collect the following personal information based on your authorization or consent:

目的或功能	我们可能需要收集的信息	处理方式
管理您与我们之间的实习关系	向您支付劳务报酬所需的信息（如银行帐户信息）、紧急联系人姓名及联系方式。	收集、存储、使用、传输、提供、删除

Purposes or Functions	Personal Information We May Need to Collect	methods of processing
manage your internship relationship with us	<b>Information necessary to pay you for your services (such as bank account information), name and contact information for an emergency contact.</b>	collect, store, use, transfer, provide, delete

(3) 为本政策所述之目的，我们会接收或留取您或相关方主动提供的个人信息，或依据法律法规、监管规定或您/相关方的授权或同意，通过适当方式向汇丰集团成员或其他第三方（包括但不限于信用查询机构、信息服务提供商、相关的权力机关、雇主、联系人、近亲属及其他机构/人士）收集、查询、核实您及相关方的个人信息。

For the purpose described in this Policy, we will receive or retain the personal information provided by yourself or by relevant parties, or according to law, regulation, regulatory provision, your or relevant parties' authorisation or consent, collect, enquire, and verify by proper methods your and/or related parties' personal information from/with members of the HSBC Group or other third parties (including but not limited to credit reference agencies, information service providers, relevant authorities, employers, contact persons, close relatives and other entities/individuals).

(4) 我们收集的个人信息可能包括纸质、电子或其他任何形式的信息。

The personal information we collected may be in paper, electronic or any other forms.

(5) 您可能需要提供您是否与恒生外部第三方存在潜在利益冲突的信息。若需提供该等信息，您会收到相关通知。

You may be asked to provide the information about any potential conflicts of interest with the third parties external to Hang Seng. If this is required, you will be notified.

(6) 恒生的招聘政策规定针对某些特定岗位，申请人需要通过我们的员工背景调查。在此情况下，在该等调查完成之前，您的申请无法予以进一步处理。

**It is part of Hang Seng's recruitment policy that for certain positions you will be subject to certain employee background vetting. In such case, your application cannot progress unless the said vetting is conducted.**

您也可能受邀自愿提供与雇员多样性相关的个人信息，如民族、性别、是否残疾等。是否提供该等信息不会对我们评估您的职位申请产生任何影响。若您自愿提供该等信息，该等信息将仅用于我们统计雇员候选人多样性或在招聘过程中为您提供额外帮助的目的。

**You may also be invited to provide some diversity information as part of your profile, including but not limited to your nation, gender, physical disability, if you wish. Refusal to provide such information will not adversely affect our evaluation of your job application. Such information which you are willing to provide will only be**

used for recording the diversity of our candidates or for providing you with additional assistance in the recruitment process.

### 三、 我们如何使用您的个人信息

#### How We Use Your Personal Information

(1) 我们会基于下述目的、用途使用您的信息:

We will use your information for the following purposes:

- a. 为实现本政策上述第二条“我们如何收集您的个人信息”中和下述第六条“信息处理的特殊情形”所述之目的和功能;  
to realize the purpose and function described in above Article 2 of this Policy, “How We Collect Your Personal Information” and in below Article 6 of this Policy “Special Circumstances for Information Processing”;
- b. 遵守或执行任何适用规范 (“适用规范”指适用于任何汇丰集团成员的法律、法规、条例、规章、判决、裁定、自律守则、指令、制裁制度、法院命令、任何汇丰集团成员与权力机关之间的协议，或权力机关之间达成的适用于我们或汇丰集团成员的协议或条约) 或任何权力机关的命令或要求;  
to comply with any Applicable Laws (“Applicable Laws” refer to any applicable statute, law, regulation, ordinance, rule, judgment, decree, voluntary code, directive, sanctions regime, court order applicable to any member of the HSBC Group, agreement between any member of the HSBC Group and an authority, or agreement or treaty between authorities and applicable to the Bank or a member of the HSBC Group) and any order or requirement from any authority
- c. 履行我们及汇丰集团的合规责任 (包括监管合规、税务合规及在任何适用规范项下或任何权力机关要求的合规责任) 或执行我们及汇丰集团为履行合规责任而制定的政策和程序;  
to perform our and HSBC group's compliance responsibilities (including regulatory compliance, tax compliance and compliance with any applicable regulation or the requirements from any authority), or to implement any policy or procedure made by us and the HSBC Group for the performance of compliance obligations;
- d. 为我们或汇丰集团的人事管理,业务运营和管理之需,包括但不限于监督和审查恒生的招聘和/或外包流程,全球化运营、系统或产品研发、审计等;  
to manage HR administration and business operation/management of Hang Seng or HSBC group, including but not limited to oversight and review Hang Seng's recruitment and/or outsourcing process, globalize operation, system/ products development, and audit, etc.;
- e. 向您推荐其他您可能感兴趣的汇丰集团内部职位。  
to facilitate our advice to you of other internal employment opportunities of HSBC Group which may interest you.

(2) 本政策前述有关信息收集、使用的内容不影响我们按照您与我们另行特别约定的用途使用您的信息。

The above information collection and use in this Policy will not affect our use of your information for the purposes as otherwise agreed between us.

(3) 若我们要将您的个人信息用于本政策载明或您与我们另行约定的收集、使用范围、目的/用途以外的其他用途,我们会向您告知该等用途等信息,并在适用的法律法规要求时,我们须在使用前再次征得您的同意。

If we use your personal information for the purposes other than the scope and purposes of information collection and use as set forth in this Policy or in other agreement between us, we shall inform you how we use this information and obtain consent from you before using your personal information for such additional purposes as per applicable laws and regulations.

### 四、 我们如何存储您的个人信息

#### How We Store Your Personal Information

当我们收集或处理您的个人信息时,我们将依据法律法规、监管规定、档案、会计、审计、报告要求以及本政策所述之目的、

用途，将您的个人信息保存至满足信息收集目的、用途所需的合理保存时间。在相应保留期结束后，我们会将相关信息进行销毁、删除或匿名化处理，或者在销毁、删除或匿名化从技术上皆不可能实现的时候，安全地储存您的这些个人信息并且将这些个人信息与其他的数据处理区隔开。但我们依据法律法规、监管规定、档案、会计、审计、报告要求，您与我们之间的特别约定，向您、监管机构及其他有关机关提供记录查询，而需要继续保留的信息除外。

When we collect or process your personal information, we will store your information for a period as minimum as necessary to fulfill the purposes of information and its use, in accordance with laws, regulations, archival, accounting, auditing, reporting requirements, and the purposes and use described in this Policy. After the retention period expires, we will destroy, delete or anonymize relevant information, or where the destruction, deletion or anonymization is not possible, store your personal information securely and separate it from other data processing. Except for the information that needs to be retained in accordance with laws, regulations, archival, accounting, auditing, reporting requirements, special agreements between us, or for record check or enquiry from you, regulators or other authorities.

## 五、 我们向谁披露您的个人信息

### To Whom We Disclose Your Personal Information

#### (1) 委托处理、共享

#### **Entrusted processing and Sharing**

为本政策前述之目的与用途，在必要且采取相应的保护措施（参见本政策前述第一条“我们如何保护您的个人信息”）的前提下，我们会把您的个人信息的部分或全部提供、披露给下列接收者（接收者亦可为上述目的和用途，使用、处理及披露该等信息，但需依法或根据我们的要求采取相应的保护措施）：

For the above-mentioned purposes and use in this Policy, we will provide or disclose all or part of your personal information to the following recipients under the preconditions that such provision or disclosure is necessary and is made with proper protective measures (please refer to Article 1 of this Policy “How We Protect Your Personal Information” for details) and the recipient may also use, process and disclose such information for the above-mentioned purposes and use, provided that corresponding protective measures are adopted pursuant to the applicable laws or our requirements:

- a. 汇丰集团成员：  
any members of the HSBC Group;
- b. 汇丰集团的相关承包商、分包商、代理人、服务或产品供应商、专业顾问、或汇丰集团的关联人（包括其雇员、董事、职员、招聘代理）；  
any contractor, subcontractor, agent, service or product provider, professional consultant, or associated person of the HSBC Group (including their employees, directors, officers and recruitment agencies);
- c. 任何我们或汇丰集团成员的监管机构或其他权力机关，或监管机构或其他权力机关指定的机构或人士（例如：为了公共卫生安全目的、阻止或发现违法行为或保护公共利益之目的提供给相关监管机构或其他权力机关或其指定的机构或人士）；  
Any regulator of Hang Seng or any member of the HSCB Group or any other authority, or any organisation or individual designated by such regulator or authority. (for example: provide information to regulator or other authority or their designates for the purposes of public health safety, prevention or detection of illegal activities or to protect the public interest);
- d. 经您授权或依法代表您行事的任何人士，例如您的法律顾问、职位申请人的推荐人；

Any person acting on your behalf according to your authorisation or applicable law, e.g. your legal adviser or referee of job applicant;

当且仅当前述接收者涉及境外机构/人士时，该等提供和披露会发生个人信息的跨境传输，包括传输至境外或受到来自于境外的访问。如果恒生涉及跨境传输您的个人信息，我们会向您告知境外接收方的名称或者姓名、联系方式、处理目的、处理方式、个人信息的种类以及您向境外接收方行使法律法规规定的权利的方式和程序等事项，具体请见恒生的《职位申请人及实习生个人信息跨境传输告知清单》，并取得您的单独同意，但法律法规另有规定的除外。无论是在境内或境外处理个人信息，根据适用的个人信息或数据保护法律，您的个人信息将受到我们、汇丰集团成员及其员工以及第三方均需遵守的保密及安全规范的保护。我们将会对跨境提供您的个人信息采取必要措施，保障境外接收方处理您的个人信息的活动达到法律法规和本政策规定的个人信息保护标准。

Such provision and disclosure will result in the cross-border transmission of personal information, including information being transmitted to or be accessed from overseas only when the said recipient is an overseas institution/person. If your personal information is cross-border transferred, we will seek your separate consent and notify you of the name and contact information of the specific overseas recipients, the purposes and methods of processing, the types of personal information processed, and the methods and procedures for exercising your rights against overseas recipients, unless otherwise prescribed by any laws or regulations. For details, please refer to the Notification List for Job Applicant and Intern Personal Information Cross-border Transfer. Whether it is processed domestically or overseas, your personal information will be protected by a strict code of secrecy and security to which, we, other members of the HSBC Group, their staff and third parties are subject in accordance with applicable personal information or data protection laws. We will take necessary measures to secure your personal information provided to offshore and request offshore recipients to abide by our personal information protection standard stipulated to comply with laws, regulations and this Policy when processing your personal information.

## (2) 转让

### Transfer

除非获得您的单独同意，我们不会将您的个人信息转让给任何公司、组织或个人，但在涉及我们的任何业务/资产转让、重组、处置（包括资产证券化）、合并、分立、收购时需要转让的除外。如涉及个人信息转让，我们会要求新的持有您个人信息的公司、组织或人士继续接受本政策的约束，否则我们将要求该公司、组织或人士重新向您征求授权同意。

Without your separate consent, we will not transfer your personal information to any other company, organization or individual, except in case of any transfer of our business/assets, restructure, disposal(including securitization), merger, division or acquisition where the transfer is necessary. Where any personal information is transferred, we will request the receiving company, organization or individual to comply with this Policy. Otherwise we will request such company, organization or individual to seek separate consent from you.

## (3) 公开披露

### Public Disclosure

如须披露，我们会向您告知公开披露的目的、披露信息的类型及可能涉及的敏感信息。并且除非获得您的单独同意，我们不会对外公开披露您的个人信息。

If public disclosure is needed, we will inform you of the purpose of such disclosure, the type(s) of information being disclosed and the sensitive information that may be involved. And unless we have your separate consent, we will not disclose your personal information to the public.

## 六、 信息处理的特殊情形

## Special Circumstances for Information Processing

一般情况下，我们会基于您的同意来处理（比如收集、存储、使用、加工、传输、提供、公开）您的个人信息。但是，依据相关法律法规的规定，在以下情形中，我们处理您的个人信息不必征得您的同意：

We will process your personal information (such as information collection, storage, use, analysis, transfer, provision, disclosure) based on your consent. To the extent allowed by laws and regulations, we may process your personal information without your consent under the following circumstances:

(1) 为订立、履行您作为一方当事人的合同所必需的；

where it is necessary for entering into a contract or the performance of a contract to which you are the party;

(2) 为履行法定职责或者法定义务所必需的；

where it is necessary for compliance with a legal obligation to which we are subject;

(3) 为应对突发公共卫生事件，或者紧急情况下为保护您或其他个人的生命健康和财产安全所必需的；

where it is necessary in order to protect your or others' vital interests related to life and property in an emergency or respond to public health emergencies;

(4) 为公共利益实施新闻报道、舆论监督等行为，在合理的范围内处理个人信息；

where it is within reasonable limits in order to carry out news coverage or media supervision for the public interest;

(5) 依照适用的法律法规在合理的范围内处理您自行公开或者其他已经合法公开的个人信息的；

where it is within reasonable range according to law to process the information which has been legally made public or publicized by yourself; or

(6) 法律、行政法规规定的其他情形。

other circumstances stipulated by laws and regulations.

## 七、 我们如何使用 Cookies 及其他技术

### How We Use Cookies and Other Technologies

(1) 在您访问、浏览、使用恒生的任何网站、电子业务平台、移动设备应用程序时，网站和/或应用程序会作记录，以分析网站和/或应用程序的访客人数和一般使用状况，帮助您减少信息录入的次数和频率，或协助判断您账户的安全状况。其中部分资料将通过“Cookies”方式收集。我们使用 Cookies 以使得我们的网站和/或应用程序更为安全，更方便使用。请注意 Cookies 收集的是去标识化的集体统计资料，并不包括姓名、地址、电话、邮箱地址等个人联络资料。大多数浏览器和/或应用程序的初始设置为同意使用“Cookies”。您可以根据自己的偏好管理或删除 Cookies。如果您想禁用 Cookies，可更改您的浏览器和/或应用程序的设置，但更改后您有可能无法使用网站和/或应用程序的某些部分业务功能。

Your visit, browse, use of any website, electronic business platform or mobile device application of the Bank may be recorded for analysis on the number of visitors to the site and general usage patterns, helping you reduce the number and frequency of information entry or assisting determine the security status of your account. Some of this information will be gathered through the use of "Cookies". Cookies can enable us to provide safer and more useful features for website or application users. The information collected by "Cookies" is unidentified aggregated research data, and contains no name or address information or any information that will enable anyone to contact you via

**telephone, email or any other means.** Most browsers and/or applications are initially set to accept Cookies. You can manage or delete Cookies as per your preference. Should you wish to disable Cookies, you may do so by changing the setting on your browser and/or application. However, by disabling them, you may not be able to take full advantage of our website and/or application.

(2) 此外，我们可能会使用来自于第三方公司的调查网站和/或应用程序流量的服务，以及与恒生的网站和/或应用程序相关的其他服务。该等第三方公司包括但不限于 **Adobe** 等，他们会使用 **Cookies** 等技术收集资料以作分析，以：(i) 搜集更多关于恒生网站和/或应用程序的访问情况，包括用户分布、行为及使用模式；(ii) 作出更准确的报告，及 (iii) 提高恒生的市场推广效率。该等公司会将收集的资料综合后提供给我们，但我们不会为此调查而向其提供或从其获取可辨别您身份的个人资料。如您想禁用与该等技术有关的 **Cookies**，可更改您的浏览器和/或应用程序的设置，更改后您可能无法进入网站和/或应用程序的某些部分。

We may also work with third parties to research certain usage and other activities on the website and/or application. These third parties include without limitation to **Adobe**, etc. They use technologies such as "Cookies" etc. to collect information for such research, (i) to find out more about users, including user demographics and behavior and usage patterns, (ii) for more accurate reporting and (iii) to improve the effectiveness of our marketing. They aggregate the information collected and then share it with us. No personally identifiable information about you is collected or shared by such third parties with us as a result of this research. Should you wish to disable the Cookies associated with these technologies, you may do so by changing the setting on your browser and/or application. However, after changing the setting you may not be able to enter certain part(s) of our website and/or application.

## 八、 您的个人信息相关权利

### **Your Rights Relating to Personal Information**

(1) 您有权要求我们按照法律法规及本政策的规定，保障您的个人信息安全，并要求行使适用的法律法规赋予您的个人信息相关权利。

You have the right to request us to protect and secure your personal information in accordance with the provisions of the laws, regulations and this Policy. You have the right to exercise your rights of individual granted by applicable laws and regulations.

(2) 您有权向我们查询我们是否持有您的个人信息及查阅、复制您所提供的您的个人信息。

You have the right to check with us whether we hold your personal information as well as to access and copy the personal information you provide.

(3) 您有权改变您授权同意的范围或撤回您的授权，并按本政策“九、如何联系我们”所列方式进行操作。当您改变授权范围后，我们将不再处理不属于新授权范围内的相应个人信息。但您撤回同意的决定，不会影响我们此前基于您的授权而开展的个人信息处理。

You have the right to change the scope of authorization or withdraw your consent, and please follow Article 9 of this Policy "How to contact us". We will not further process the related information once you change your authorization. Please note the withdrawal of consent will not affect the lawfulness of processing based on consent given by you before its withdrawal.

(4) **您有权也有义务及时更新您在恒生的个人信息，以确保相关信息是准确和最新的。** 您有权要求我们为您更新个人信息提供便利，有权要求我们更正任何有关您的不准确的信息。

**You have the right and obligation to updated your personal information in Hang Seng to ensure that the relevant information is accurate and up to date.** You have the right to ask us to provide convenience for you to update your

personal information and to correct any of your information that is inaccurate.

(5) 您有权要求我们根据法律法规、本政策及您与我们之间的约定，删除或以其他方式妥善处理超过保留期的您的个人信息。  
You have the right to request us to delete or otherwise properly dispose of your personal information that is beyond retention period in accordance with laws, regulations, this Policy and other agreement between us.

(6) 本政策不会限制您作为个人信息主体根据适用的法律法规享有的其他权利。

Nothing in this Policy will limit the other rights you should have as a Personal Information Subject under applicable laws and regulations.

## 九、 如何联系我们

How to contact us

(1) 任何关于查阅、复制、转移、更正、补充、删除、限制处理个人信息，注销账号、改变/撤回同意，处理超过保留期的个人信息，或索取个人信息保护政策文本及了解我们有关个人信息和隐私保护的做法的要求，或行使其他适用的法律法规赋予您的个人信息相关权利的要求，可通过以下所列的联系方式向我们提出。我们将在收到您的要求后 15 个工作日内完成核查和处理。 专线: 021-61823319

Requests for access to, copy, transfer, correct, supplement, delete, and restrict the processing of personal information, to cancel their accounts and change/withdraw their consent or disposal of personal information beyond retention period, or for a copy of this Policy, or for enquiries about our practices regarding protection of personal information and privacy, may be addressed to us through the contact information listed below. Upon the receipt of your request, we will reply to you within 15 working days. Hotline: 021-61823319

(2) 为了保障安全，您可能需要提供书面请求，或者以其他方式证明您的身份。我们可能会要求您先验证自己的身份，然后再处理您的请求。

For security purpose, you may need to raise your request in written form or use other methods to prove your identity. We may request you to verify your identity before processing your request.

(3) 对于您前述有关查阅、更正以及其他处理个人信息的合理要求，我们不会向您收取费用。

We will not charge fees for the processing of your aforementioned reasonable requests for access, correction or other disposal of your personal information.

尽管有上述约定，对非法、违规、无端重复、需要过多技术手段（例如，需要开发信息系统或从根本上改变现行惯例）、给他人合法权益带来风险、超出合理限度或者技术上不切实际的要求，我们可能会予以拒绝。在以下情形中，按照法律法规要求，我们也可能无法响应您的请求：

Notwithstanding the foregoing, we may reject your request if it is illegal, noncompliant, or unnecessarily repeated, needs excessive technical means (for example, the need to develop information systems or fundamentally change current practices), brings risks to the legitimate rights and interests of others, is unreasonable or technically impracticable. We may not be able to respond to your request under any of the following circumstances as required by laws and regulations:

a. 与我们履行法律法规规定的义务或金融监管合规义务相关的；

where the request is in relation to our legal and financial compliance obligation under laws and regulations;

- b. 与国家安全、国防安全直接相关的;  
where the request is in direct relation to state security or national defence security;
- c. 与公共安全、公共卫生、重大公共利益直接相关的;  
where the request is in direct relation to public security, public sanitation, or major public interests;
- d. 与刑事侦查、起诉、审判和判决执行等直接相关的;  
where the request is in direct relation to criminal investigations, prosecutions, trials, execution of rulings, etc.
- e. 有充分证据表明您存在主观恶意或滥用权利的;  
where there is sufficient evidence that you are intentionally malicious or abuse your rights;
- f. 出于维护您或其他个人的生命、财产等重大合法权益但难以获得您本人授权同意的;  
where the purpose is to protect you or other individual's life, property and other substantial legal interests but difficult to acquire your consent;
- g. 响应您的请求将导致您或其他个人、组织的合法权益受到严重损害的;  
where responses to your request will give rise to serious damage to your or any other individual or organisation's legal rights and interests;
- h. 涉及商业秘密的。  
where the request involves any trade secret.

(4) 我们会不时向您直接发送与恒生工作机会相关的信息以供阅览。我们不会向您发送任何理财产品销售推广信息及/或为了任何理财产品广告促销目的而使用您的个人信息或将您的个人信息提供予其他人士。您亦有权通知我们行使您的选择权，拒绝接收此类工作机会信息。如果您选择拒绝接收工作机会信息，请通过本政策前述联系方式联络我们，我们将在收到您的要求后尽快（通常不应迟于收到您的要求后 15 个工作日内）采取相应措施。

We will send you job advertisements and information on Hang Seng vacancies from time to time. But we will not send you any financial product advertisement/promotion information or use your information or disclose your information to any third party for financial product advertisement/promotion purpose. You are entitled to notify us and exercise your right of choice, not to receive such job advertisement any more. If you so choose to reject job advertisement message, please contact us through the contact information listed in this Policy. After receipt of your request we will, as soon as practical (usually no later than 15 working days from your request), take relevant actions.

(5) 您有权就我们有关个人信息和隐私保护的做法进行监督或提出建议，并就我们或我们员工的任何侵害您的有关个人信息和隐私的权益的行为提出投诉或依法求偿。

You may supervise or make recommendations for our practices regarding the protection of personal information and privacy, and lodge complaints or demand compensation against us or our staff for any infringement of your rights and interests in your personal information and privacy according to laws.

如您有任何疑问、投诉、反馈、意见或建议，请通过本政策前述联系方式与我们进行联络。

If you have any question, complaint, feedback, comment or suggestion, please contact us through the contact information listed in this Policy.

十、 本政策的更新及其他

Updated of this Policy and others

(1) 本政策（包括《[职位申请人及实习生个人信息跨境传输告知清单](#)》）可能不时修改、更新。我们会在恒生的网站和/或相关应用程序中发布该等修改、更新，请您不时关注相关发布。我们也会视情况以信息推送、短信发送、电话通知等方式向您告知发布内容。该等修改、更新自发布之日起生效并取代此前相关内容。本政策的变更不应削减或限制您作为个人信息主体根据中国法律享有的权利。

This Policy (including the [Notification List for Job Applicant and Intern Personal Information Cross-border Transfer](#)) may be amended and updated from time to time. **We will post the changes to the Policy and the updated Policy on Hang Seng website and/or related application. Please keep your eyes on these messages. We will also inform you of the said messages, as the case may be, by means of information push, SMS, call, etc. The changed/updated Policy will take effective when it is issued**, and shall not limit your rights you should have as a Personal Information Subject under Chinese law.

(2) 如您向我们提供其他人士的个人信息，您应确保该人士知悉本政策（包括《[职位申请人及实习生个人信息跨境传输告知清单](#)》）及其后续不时更新，并应特别告知该人士我们将如何根据本政策规定处理其个人信息且您已取得该第三方充分、知情且有效的同意（包括根据适用法律的要求所取得的单独同意和/或书面同意）。您可提醒该人士事先阅读本政策，也可以向该人士提供本政策的副本。

Where you provide to us with the personal information of another person, you should ensure that the person acknowledges this Policy (including the [Notification List for Job Applicant and Intern Personal Information Cross-border Transfer](#)) and its subsequent updates from time to time. In particular, you should tell him/her how we use his/her information according to this Policy and should ensure that you have obtained the full, informed and valid consent of the third party (including the separate consent and/or written consent as required by applicable laws). You may remind that person to read this Policy in advance or give him/her a copy of this Policy.

(3) 如您同时是恒生的客户，请参阅与客户相关的个人信息保护政策。

If you are also a customer of Hang Seng, please peruse the personal information protection policy to customers.

(4) 本政策中英文本如有歧义，概以中文为准。

In case of discrepancy between the Chinese and English versions of this Policy, the Chinese version shall apply and prevail.