Personal Information Processing Guideline

The Hongkong and Shanghai Banking Corporation Limited, Seoul (the "Bank") has in place a procedure necessary for protecting personal information and rights of its customers and properly handling customer inquiries and complaints arising therefrom in accordance with Article 12 Paragraph 1 of Personal Information Protection Act and Article 30 of the same Act.

Article 1 (Scope)
The Status and Procedure of Processing Personal Information ("Procedure") shall apply to operation of personal information files created in any form including but not limited to electronic file, printed materials or other paper documents.

Article 2 (Personal Information Protection)

① You should make the purpose of personal information processing explicit and specified and shall collect minimum personal information lawfully and fairly to the extent necessary for such purpose.
② You should process personal information compatibly to the extent necessary to attain the personal information processing purposes, and shall not use beyond such purposes.
③ You should ensure the personal information accurate, complete and up to date to the extent necessary to attain the personal information processing purpose and also ensure that the personal information is not unfairly altered or damaged due to wilful misconduct or negligence during the process.
④ You should manage personal information in a safe way according to the personal information processing methods, types, etc. in consideration of the possibility that the data subject rights are infringed upon and the degree of such risk by using appropriate managerial, technical and physical measures.
⑤ You should make public the Procedure and other personal information processing matters and should come up with reasonable procedures and methods to guarantee the data subject rights (as defined in the Personal Information Protection Act) including` the right to access to his/her personal information.
⑥ You should process personal information in a manner to minimize the possibility to infringe on the privacy of a data subject.
⑦ You should endeavor to process personal information in anonymity if possible even when you lawfully collected personal information.
⑧ You should endeavor to obtain trust of data subjects by observing and performing such duties and responsibilities as provided in the relevant laws and regulations.

Article 3 (Collection of Personal Information)

The Bank may collect personal information and use it within the scope of the purpose of collection to the extent permitted by the relevant laws and regulations.

Article 4 (Purpose of Personal Information Processing)

The Bank processes personal information of its customers for the following purposes. The personal information processed by the Bank shall not be used for other purposes than the followings, and if the Bank intends to change the purpose of using personal information, it will obtain a prior consent from a

data subject except cases where the Bank is permitted to change the purpose without consent of a data subject under the relevant laws and regulations.

1. Financial Relationship

   The Bank may process personal information for the purpose of carrying out credit checks of its customers with credit reference agencies or credit collection agencies, determining whether to establish financial relationship, maintaining and managing financial relationship, investigating financial incidents, resolving disputes, handling complaints and complying with all statutory and regulatory requirements.

2. Marketing Promotions

   The Bank may process personal information for the purpose of developing new products or services and providing tailored services based on customer satisfaction surveys or market research, providing services and advertisements more suitable in statistical and demographic terms, confirming validity of services, providing free gifts or promotions and gathering statistical information on customers' login frequencies or patterns of use of services.

3. Management of Membership

   The Bank may process personal information for the purpose of managing and maintaining membership services, verifying identity, carrying out personal identification, preventing illegal or unauthorized access, determining customers' intent to join as members, checking whether consent of a legal agent is obtained when collecting personal information of a child under 14, verifying identify of the legal agent, investigating incidents, resolving disputes, handling complaints, sending notices for members-only services, etc.

4. Online Transaction

   The Bank may process personal information for the purpose of tracking down or searching electronic financial transaction details under Article 21 and Article 22 of the Act on Electronic Financial Transactions or using the information for statistical data necessary to establish security policies, etc.

5. Employment, Human Resources Management, Information Exchange

   The Bank may process personal information for the purposes of hiring bank employees, managing human resources, helping those who worked in the financial businesses to find employment, exchanging information on officers and employees between financial institutions, etc.

Article 5 (Period of Retention and Use)

① Personal (credit) information relating to financial transactions shall be kept and in use from the date when consent to the collection and use of the information is obtained to 5 years after the termination date of the relevant transaction for the aforementioned purposes. Following the termination date, the information is kept for the sole purpose of investigating financial incidents, resolving disputes, handling complaints, complying with all statutory and regulatory requirements and managing risk.

② Personal (credit) information collected for credit checks shall be kept and in use from the date when consent to the collection and use of such information is obtained to the date when consent to provision and inquiry of credit information remains effective. When the information has reached the end of its shelf-life, it is kept and used for the sole purpose of investigating financial incidents, resolving disputes, handling complaints and complying with all statutory and regulatory requirements.

③ Personal (credit) information relating to promotion and solicitation for products and services shall be kept and in use from the date when consent to collection and use of the information is obtained to the date when the consent is withdrawn. After the consent is withdrawn, the information is kept and used for the sole purposes of investigating financial incident, resolving disputes, handling complaints and fulfilling statutory and regulatory obligations in connection with Article 1 hereof.

④ Personal (credit) information collected for the purpose of providing customers with a comprehensive range of membership services shall be kept and in use from the date when the customer subscribes to the service to the date when the customer cancels the membership. After the membership is canceled, the information is kept and used for the sole purpose of investigating financial incident, resolving disputes, handling complaints and fulfilling statutory and regulatory requirements in connection with Article 1 hereof.

⑤ Personal (credit) information relating to online transactions shall be kept and in use for the period prescribed by Article 12 of the Enforcement Decree of Electronic Financial Transaction Act.

⑥ Personal information of bank officers and employees shall be kept and in use for the sole purpose of investigating financial incident, resolving disputes, handling complaints and fulfilling statutory and regulatory requirements even after retirement.

Article 6 (Notification on Sources, etc. of Personal Information Collected)

① In case of processing personal information collected from other sources than the subject of the information, the Bank shall notify the subject of personal information of the collection source, the purposes for which the information is processed and the fact that the subject of information

has the right to request suspension of the processing within three (3) days from such request unless there exists any justifiable cause. However, in case of any of the following subparagraphs, this shall not apply:

1. Where personal information, which is subject to a notification request is included in the personal information files referred to in Article 32 Paragraph ② of the Personal Information Protection Act;
2. Where such notification is likely to cause harm to the life or body of any other person, or unfairly damage the property and other profits of any other person.

② In case of rejecting the aforementioned request of the subject of information in accordance with Paragraph ①, the Bank shall notify the subject of information of the grounds and reasons for the rejection within three (3) days from the date of the request.

Article 7 (Provision of Personal Information to a Third Party and Outsourcing)

① The Bank, in principle, shall process personal information of its customers within the scope of the purposes prescribed in Article 1 hereof and shall neither process the information beyond the scope nor pass it to any third party without prior consent of the relevant customer. However, if any one or more of the following apply, the Bank may use personal information of its customers for other purposes or provide it to a third party except for cases where such use or provision of information could harm interests of the relevant customer or the third party.

1. Where the Bank obtained consent to provision or disclosure to a third party from the customer;

2. Where special provision exists in any other Act;

3. Where it is deemed obviously necessary for physical safety and property interests of the customer or the third party when the customer or his/her legal representative cannot give prior consent as he/she is unable to express his/her intention or by reason of his/her unidentified address, etc.; or

4. Where personal information is necessary for compiling statistics, or scientific research purposes, etc. and the personal information is provided in a form by which a specific individual cannot be identified.

② The Bank provides personal (credit) information to a third party as follows:

1. Persons or Institutions to whom personal information is provided and Purpose of Provision:
   - Credit Information Collection Agency (Korea Federation of Banks, Credit Finance Association, etc.), Credit Reference Agency (Seoul Credit Information Service, Korea Credit Bureau, Nice Information Service, etc.): Credit information collection to be provided to financial institutions

- Public organizations requiring the information in accordance with the relevant laws and regulations: for the purpose set forth in the laws and regulations

-Product/service purchase agreement counter-party

No.	**Purpose of Provision**	**Provided to**
1	Title Insurance for Real Estate Mortgage Mortgage Credit Insurance	First American Title Insurance Company, Seoul Guarantee Insurance
2	Registration of real estate provided as collateral and check on the household which moved in the real estate, Debt collection (lawsuit, attachment, auction, etc.)	Woo Young Judicial Scrivener Office,
3	Appraisal of real estate provided as collateral	Serve Appraisal Co Ltd
4	Asset Management Report	Korea Securities Depository
5	SMS	Standard Networks
6	OTP Delivery Service	Taepyeongro Post Office

- Foreign Regulatory Authorities, Head Office/ Affiliates

No.	Purpose of Provision	Provided to
1	Report, Approval, Audit, Examination, etc.	Hong Kong Monetary Authority, The Hongkong and Shanghai Banking Corporation Limited, and its affiliates
2	IT system operation, server management, supporting service, etc.	The Hongkong and Shanghai Banking Corporation Limited, and its affiliates

- Service providers to whom the Bank outsourced part of its businesses

No.	**Purpose of Provision**	**Provided to**
1	Use of HSBC Connect	HSBC Technology Service Asia Pacific
2	SCDM (Security and Compliance Data Matching)	The Hongkong and Shanghai Banking Corporation Limited(
3	OTC Derivatives CSA Collateral Margin Calculation	The Hongkong and Shanghai Banking Corporation Limited
4	Global Liquidity Management Service	HSBC Electronic Data Processing India Private Limited
5	CAMP (Customer Activity Monitoring Program)	HSBC Electronic Data Processing (Guangdong) Ltd
6	HSBCnet Maintenance	HSBC Electronic Data Processing (Malaysia) Limited
7	Outsourcing of Nostro Account Reconciliation	HSBC Global Services (UK) Limited
8	Credit Risk Exposure Calculation	HSBC Electronic Data Processing India Private Limited
9	Back office affairs and Basic accounting service for Exotic OTC Derivatives	The Hongkong and Shanghai Banking Corporation Limited
10	Global Client Reporting	HSBC Electronic Data Processing (Malaysia) Limited
11	Electronic Financial Service	HSBC Electronic Data Processing India Private Limited

12	Collateral management under Regional CSA	The Hongkong and Shanghai Banking Corporation Limited
13	CVA Calculation	The Hongkong and Shanghai Banking Corporation Limited
14	Rate fixing	HSBC Global Services (UK) Limited
15	RID Off-shoring Project	HSBC Global Support Centre (Hyderabad Credit & Risk Centre of Excellence)
16	ORTT(Overseas Remittance Telegraphic Transfer)	HSBC Global Services (UK) Limited
17	IRTT CHARGE CLAIM	HSBC Global Services (UK) Limited
18	Part of Sub-Custody and Clearing	HSBC Electronic Data Processing (Philippines) Limited
19	Support for HSBC Group's FSU/ IFS/ IDQ system service for FATCA and Global Standard related purposes	The Hongkong and Shanghai Banking Corporation Limited
20	TREATS system upgrade	The Hongkong and Shanghai Banking Corporation Limited
21	Introduction of COAS	HSBC Global Services (UK) Limited
22	Trust service for foreign currency assets	HSBC Institutional Trust Services (Asia) Limited
23	CCR RWA related affairs reported to PRA and HKMA	HSBC Electronic Data Processing India Private Limited
24	Sanctions Screening to MT500 (inter-bank message on stock trading)	HSBC Global Operations Company Limited
25	KYC/CDD related information processing (Global Standard)	HSBC Bank PLC
26	CTCR(Customer Tax Compliance Reporting) system to automatically generate FATCA and CRS report	The Hongkong and Shanghai Banking Corporation Limited and HSBC Software Development India
27	Sanctions Screening to MT 100 (Customer Payments & Cheques) and MT200 (Financial Institution Transfers)	HSBC Electronic Data Processing India Private Limited
28	Import / Export related affairs (including loan)	HSBC Electronic Data Processing India Private Limited

29	Granting access to WhatIF in relation to CVA calculation	The Hongkong and Shanghai Banking Corporation Limited
30	Six GUI Monitoring	HSBC Global Services Limited
31	OTC derivatives related back office affairs	HSBC Electronic Data Processing (Malaysia) Limited HSBC Electronic Data Processing India Private Limited HSBC Electronic Data Processing (Philippines) Limited
32	HSBCnet maintenance	HSBC Electronic Data Processing India Private Ltd HSBC Electronic Data Processing (Guangdong) Limited
33	Investigation for Unusual Activity Report	HSBC Electronic Data Processing (Guangdong) Limited
34	Sanctions Screening to MT 100 (Customer Payments & Cheques) and MT200 (Financial Institution Transfers)	HSBC Electronic Data Processing (Guangdong) Limited
35	Market price check on import/export related products	HSBC Singapore Branch
36	Credit Limit Monitoring and Maintenance	HSBC Electronic Data Processing (Philippines) Limited
37	Trade validation - Vanilla products	HSBC Hong Kong GM Ops
38	Traded Credit Risk Control Korea	-HSBC Electronic Data Processing India Private Limited (Bangalore) -HSBC Electronic Data Processing (Philippines) Limited (Manila)
39	CRS report material extracting system agreement	The Hongkong and Shanghai Banking Corporation Limited
40	Level 3 Anti Money Laundering Red Flag reviews for Trade Transaction	The Hongkong and Shanghai Banking Corporation Limited
41	- Determining customer screening alerts and verifying the validity on the results - Determining transaction screening (remittance, securities, trade) alerts and verifying the validity on the results	The Hongkong and Shanghai Banking Corporation Limited
42	Performance Level Agreement on outsourcing of early warning activity	HSBC Electronic Data Processing India Private Limited(Hyderabad II)
43	Outsourcing of overseas remittance, overseas deposit and deposit/withdrawal relating to domestic transfer of foreign	HSBC Electronic Data Processing (Guangdong) Limited

	currency	
44	Data Processing Agreement-CAMP Retail	HSBC Global Services (UK) Limited(UK ServCo)
45	GEEU (Global Exit Execution Utility)	GSC Bangalore & GEEU UK
46	Preparing materials on CARM	HSBC Electronic Data Processing India Private Limited
47	Quality assessment of CDD profile	HSBC Electronic Data Processing India Private Limited
48	Account opening and report/change of corporate deposit customers, account closing of corporate/individual customers, FATCA/CRS information input	HSBC Electronic Data Processing (Guangdong) Limited
49	Korean HSBCnet help desk	HSBC Electronic Data Processing (Guangdong) Limited
50	Sending email to customers regarding deposits/remittances	HSBC Electronic Data Processing (Guangdong) Limited
51	Determining transaction screening (remittance, securities, trade) alerts	The Hongkong and Shanghai Banking Corporation Limited Hong Kong Office(Level 3 Sanctions Center of Excellence)
52	Outsourcing of loan document management and execution for corporate customers and report preparation	HSBC Electronic Data Processing(Guangdong) Limited
53	Storage of data to be submitted to Monitors by HSBC Seoul branch	Intralinks and Ernst & Young LLP(Relativity)
54	CAMP (Customer Activity Monitoring Program)	HSBC Electronic Data Processing (Guangdong) Limited
55	OWS(Oracle Watchlist Screening) PEP (Political Exposed Person) Level 3 Screening	HSBC Electronic Data Processing India Private Limited
56	Calculation of allowance for bad debts based on IFRS 9	HSBC Electronic Data Processing India Private Limited
57	Project FAME	HSBC Global Services (UK) Limited
58	Project Oceanus(2)	HSBC Electronic Data Processing India Private Limited(Bangalore)
59	Surveillance of staff's telecommunications (including emails sent or received via the Bank's email account, records of Bloomberg or Reuter communication, call	-The Hongkong and Shanghai Banking Corporation Limited (Head Office in Hong Kong) -HSBC Global Services (UK) Limited & its related entities

	history) and financial transactions with customers	
60	Server Hosting and Disaster Recovery for List Governance System	ICX4 Ltd, United Kingdom
61	Introduction of Platform for HR Information System	SAP Limited
62	Sanctions related investigation on abnormal transactions	The Hongkong and Shanghai Banking Corporation Limited)
63	Direct Custody and Clearing Outsourcing Project) 1) Claim to customers 2) Account opening and notification 3) Basic management 4) Customer report generation 5) Fund and securities scrutinization 6) Customers' transaction order input and reconciliation 7) Corporate Action	HSBC Electronic Data Processing (Malaysia) Sdn Bhd
64	Development and maintenance of Local Regulatory System (LRR)	HSBC Global Services (Hong Kong) Limited
65	OWS related alert level 3 (Material Screening Event)	HSBC Bank Middle East Limited (MENA SCoE or The MENA Sanctions Centre of Excellence)
66	Transfer of IT facilities from HBAP to HSBC Global Services Hong Kong Limited	HSBC Global Services Hong Kong Limited
67	Liquidity report	Google Ireland limited
68	Sub-Custody and Clearing for foreign investors	HSBC Electronic Data Processing (Philippines) Inc. (HDPP)
69	Cash and Securities Delivery Service	Brinks Korea
70	Supporting Service for Sub-Custody and Clearing	HSBC Electronic Data Processing (Malaysia) Sdn Bhd
71	Investigation of Abnormal Transactions in	HSBC Electronic Data Processing India Private Limited.

	relation with Anti Bribery & Corruption	
72	Customer Saction Screeening (Alert Level 3)	HSBC Electronic Data Processing India Private Limited (also known as GSC Hyderabad)
73	Back Office Service for Fund Business	HSBC Electronic Data Processing (Guangdong) Limited)
74	Mortgage Processing	HSBC Electronic Data Processing(Guangdong) Limite
75	AWS Enterprise Agreement	Amazon Web Services, Inc.
76	Google Cloud Platform Licence Agreement	Google Ireland Limited
77	Nostro Account Management Unit)	HSBC Global Resourcing Limited(UK)
78	Name Screening	HSBC China HDPG (Guangzhou)
79	Major Investigations QA	HSBC Global Services (Hong Kong) Limited
80	Data, MI & Analytics Development	'Google' through 'HSBC Electronic Data Processing India Private Limited'
81	List Governance Enterprise (LGE)	'Appian Software International LLC' through 'Dynamics HSBC Global Services (UK) Limited'
82	SHL Enhancement	SHL Group Limited
83	KPMG data centre migration	KPMG (KPMG Data Factory:MicroSoft Azure Cloud)
84	IBM Emptoris Contract	HSBC Global Resourcing (UK) Limited
85	Quality assurance on alert level Adjudication	HSBC Electronic Data Processing (Guangdong) Limited (a.k.a. GSC GSC Guangzhou)
86	Introduction of meeting roomreservation system (ASURE)	Jones Lang LaSalle Services Limited
87	Introduction of CSMIP Mobile Threat Protection	Amazon Web Services (AWS) through MCAFEE IRELAND LTD
88	Public Private Tagging	Appian through HSBC Global Services UK Limited (Utilisation of a cloud service provided by AWS)
89	Vetting Case Management	Appian through HSBC Global Services UK Limited (Utilisation of a cloud service provided by AWS)
90	Reservation system for the Bank building	'Amazon' through 'S1'
91	Degreed – integrated training platform	Degreed through Microsoft - Azure (cloud based data storage owner)

92	Risk management in relation with the 3rd party brabery and corruption – Sample testing on the Associated Person	HSBC Electronic Data Processing India Private Limited
93	Employee Conduct Activities (ECA)	-From 25 DEC 2021 through JAN 2022: Appian through HSBC Global Services UK Limited -From JAN 2022: HDPI (HSBC Data Processing India)
94	Fusion Lite	Oracle Corporation UK Limited
95	Symphony	Symphony Communication Services LLC
96	Employee Continuous Listening Program	Amazon web service(AWS) and Equinix through Qualtrics
97	Cloud storage of information on remittance and settlement	Google Ireland Limited
98	Cash and Securities Delivery Service	NICE CMS
99	Document preparation and submission for legal procedures	Woo Young
100	System implementation in relation with My Data service	NICE Information Service
101	Framework agreement for the provision of software and IT consultancy services	AWS through Appian Software International LLC.
102	FRAMEWORK AGREEMENT BETWEEN HSBC GLOBAL SERVICES (UK) LIMITED and APPIAN SOFTWARE INTERNATIONAL LLC	Appian Software International LLC, through 'HSBC Global Services (UK) Limited'
103	Consultancy Service Global Supply Agreement - LINK Mobility	KPMG LLP through HSBC Global Services(UK)
104	Global Managed Coaching Services	Lee Hecht Harrison Penna Limited (LHH)
105	Direct Custody and Clearing Outsourcing Project	HSBC Electronic Data Processing (Malaysia) Sdn Bhd
106	QA on alert level 3	HSBC Electronic Data Processing India Private Limited (GSC Hyderabad)
107	Automated generation of FATCA and CRS report - Client Tax Reporting (CTR) System	Deloitte LLP
108	IBOR replacement programme - ICCM Enquiry Center	AWS through HSBC Global Services (UK) Limited
109	Know Your Supplier	MS Azure through 'HSBC Global Services (UK) Limited
110	KPMG Global Payroll International Assignee Services	KPMG LLP
111	Microsoft Azure - Kulakeep	Microsoft Ireland Operations Limited
112	Microsoft Power Apps	Microsoft' through 'HSBC Global Services (UK) Limited
113	My Trades	Appian through HSBC Global Services UK Limited
114	Employee Conduct Activities (ECA)	Appian through HSBC Global Services UK Limited
115	Employee Complinace Breach Management(ECBM)	Appian through HSBC Global Services UK Limited
116	PLANView	ARCADIS
117	Regulatory Reporting Information System (RRIS)	Appian Software International LLC
118	Talent Marketplace	Gloat
119	Vulnerability Management - Agent Scanning Expansion	Google Ireland Limited

120	Debt Collections	Nara Credit Information
121	ASP DPO HUB	HSBC Global Services(Hong Kong) Limited
122	CSRA Service	HSBC Electronic Data Processing India Private Limited (GSC India)
123	Pensions Information Central Store	Google Ireland Limited
124	Sactions screening for MT 700 (Documentary Credits and Guarantees) and Trade Finance	HSBC Global Operations Company Limited
125	Healthcare application for employees	Gettheworldmoving(UK) Limited
126	Name Screening & Transaction Screening	GSC Manila2 - HSBC Electronic Data Processing (Philippines), Inc.
127	KYC for Non-resident customers	HSBC Electronic Data Processing India Private Limited -GSC India
128	Simple administrative execution to support sub-custody and clearing	HSBC Electronic Data Processing (Philippines), Inc.

2. Personal Information to be provided

- Personally Identifiable Information: name, resident registration number, nationality, occupation, contact details including address, e-mail address and telephone number
- Financial transaction information: product type, terms (interest rate, maturity, security, etc.), transaction date, amount, etc.
- Information provided on a transaction application form or directly provided by the customer (other than personally identifiable information): housing, family members, residence period, household, marriage, etc.

※ Personal (credit or financial transaction) information collected before customer's consent on the provision of the information is obtained is also included.

3. Retention of Personal Information

−Personal (Credit) information is kept and in use during the period from the date when it is provided to the date when the consent of provision is withdrawn or the purpose of provision is accomplished. After the consent is withdrawn or the purpose is accomplished, the information will be kept and used within the extent necessary to investigate financial incidents, resolving disputes, handling complaints and fulfilling statutory or regulatory requirements in connection with the aforementioned purposes.

③In case of outsourcing, the Bank explicitly sets forth the requirements to faithfully comply with laws and regulations relating to personal information protection, prevention of providing personal information to a third party and assumption of responsibility in the relevant agreement and keeps the contract in writing or in an electronic form. If there is any major change in the content thereof, the Bank will notify such change via its web page [http://www.hsbc.co.kr].

Article 8 (Customers' Rights and Obligations)

① Customers may request the Bank to view personal information of themselves or children under 14 (in case where the relevant customer is a legal agent of the child).

② Customers who have viewed their own personal information held with the Bank may request the Bank to correct or delete any information which is not accurate or verifiable and the Bank shall correct or delete as requested within ten (10) days from the date when such request is made and inform the result thereof to customers. However, customers may not request deletion of personal information in case where the relevant personal information is specified as "information required to be collected" in laws or regulations.

③ Customers may request the Bank to stop processing their own personal information, and the Bank shall respond to the request within ten (10) days from the date when such request is made by destroying the relevant personal information, etc. and inform the result thereof to customers. However, the Bank may reject such request by informing the relevant reason to the customer in case of falling under any of the following subparagraphs.

1. In case where there exist special provisions in any Act or it is inevitable to comply with statutory obligations;
2. In case where there is concern that any third person's life or body may be harmed, or any third person's property and other interest may be unduly infringed on; or
3. In case where it is impractical to perform a contract, such as a failure to provide a subject of information with stipulated services unless the personal information manager processes personal information, and the subject of information fails to clearly express his/her intention to terminate the contract.

Article 9 (Personal Information to be Processed)

The Bank is processing (collection, generation, editing, searching, using, provision, disclosure, destruction, etc.) a minimum level of information which is necessary to establish, maintain and manage financial relationship and provide goods and services as follows:

1. Required Information
- Personally Identifiable Information: Name, Resident Registration Number, Nationality, Occupation, Address, E-mail Address, Telephone Number, etc.
Financial Transaction Information: Type of Product, Terms (interest rates, maturity, security, etc.), Transaction Date, Amount, etc.
Credit Rating Information (limited to loan transactions)
Credit Worthiness Information: properties, liabilities, incomes, tax records
Credit Rating Information: default records, subrogation1, substitute payment2 record, bankruptcy,
- Other information generated from activities to establish, maintain or manage other financial relationship

2. Selective Information
- Information provided on transaction application forms (other than personally identifiable information) or information directly provided by customers
: Housing, family members, lengths of residence, householders, marriage, etc.

3. Information to be collected in accordance with Electronic Financial Transaction Act (limited to on-line transactions)
- ID, Access time/date, IP Address, HDD Serial, MAC Address, personal fire-walls, type of operating system, browser version, etc.

※ The Bank, in principle, will not collect "Sensitive Information" which could substantially infringe on the privacy of a customer. However, if it is required to collect such information, it will do so by obtaining prior consent from a customer and use the information solely for the purposes specified in the consent form. The Bank checks accuracy and up-to-datedness of Sensitive Information on a regular basis.

4. Methods of Collection
- To collect directly from customers who visit bank branches
- Through internet webpage, written forms, fax, telephone, bulletin board, e-mail, details of entries for events, delivery requests
- To collect information by using data collection tools
- Inquiries received by customer service centers

Article 10 (Destruction of Personal Information)

① When personal information becomes unnecessary as its holding period expires, its management purpose is achieved, the relevant service or business is closed, the Bank shall destroy the personal

information within five (5) days from the last date of its holding period (in case where its holding period expires) or from the date when processing of the personal information is recognized as unnecessary; provided that, however, this shall not apply in case where there is any good cause not to do so including any of the following subparagraphs:
In case where credit information collection agencies or credit rating agencies must hold the personal information in order to manage or use the credit information or evaluation credit worthiness (limited to the holding period);
In case where credit information agencies must hold the personal information as civil/criminal responsibility or legal prescription continues or they need supporting evidence to be used in disputes;
In case where the personal information must be kept under relevant laws and regulations including Article 33 of Commercial Act; or
In case where there is another justifiable reason;
② Print-outs or papers containing personal information shall be shredded or incinerated for destruction, while personal information contained in an electronic file shall be permanently deleted and made unrecoverable (at a reasonable cost with the current technological level).
③ The Bank shall keep the record of personal information destruction and the person responsible for personal information protection shall check the result of the destruction after the destruction is carried out.

Article 11 (Retention of Personal Information by Law)
In case of keeping personal information under Article 10 Paragraph ① hereof instead of destroying it, the relevant personal information shall be stored and managed separately from other personal information by using physical or technical methods.

Article 12 (Aspects Relating to Set-up, Operation and Rejection of Automated Personal Data Collection Device) Your visit to this site may be recorded for analysis on the number of visitors to the site and general usage patterns. Some of this information will be gathered through the use of "Cookies". Cookies are small bits of information that are automatically stored on a person's web browser in their computer that can be retrieved by this site. The Bank uses Cookies to improve user authentication, provide customized services, and enhance user experience while you are accessing the website. You may accept all Cookies on your web browsers, check whenever Cookies are stored or deny all Cookies storing user information. Should you wish to disable these Cookies you may do so by changing the setting on your browser.

- The Cookies setting (ex. Internet Explorer) : Menu on Browser > Internet Options > Personal Information
- There might be the service interruption if you set to disable the Cookies.

Article 13 (Security of Personal Information)
The Bank takes technical/managerial/physical measures to ensure safety of personal information and outsourced processing of personal information etc., in accordance with Article 29 of the Personal Information Protection Act and Article 5 Paragraph ② of the Regulation on Outsourcing of Information Processing of Financial Companies.

1. Encryption of Personal Information
- The Bank keeps personal information or password of customers secure by powerful encryption methods. In order to keep important data secure, the Bank employees separate sophisticated security functions such as software to encrypt or lock files/data during data transfers.

2. Technical Support to Prevent Hackers' Attack
- The Bank has established security programs to prevent personal information from being leaked or damaged by hackers' attacks or computer viruses and checked and updated the programs on a regular basis. The personal information processing systems are established in a

restricted area and technical/physical measures are taken in order to monitor and to control access.
3. Access Control of Personal Information Processing System
- By granting, changing or canceling authority to access the database system to process personal information, the Bank strictly controls access to personal information. In addition, the Bank employs sophisticated fire-walls to control unauthorized access to the system.
4. Supervision of Personal Information Managers
- The Bank is granting access to the personal information processing system to a minimum number of employees who need to carry out the processing for their duties ("personal information managers") and also keeps the scope of processing personal information to a minimum required for the business.

The Bank is supervising the personal information managers by having them submit a security agreement, etc. If a personal information manager is transferred to other position, the Bank makes change to his/her access authority to personal information as appropriate.

Article 14 (Change in Procedures for Processing Personal Information)
In case of making any change in thes Procedure, the Bank shall make public when and what it would change and provide help customers easily understand such change by comparing before and after the change.

Article 15(Personal Information Processing of Bank Officers and Employees)
The Procedure shall apply mutatis mutandis to processing personal information of the Bank's officers and employees.

Article 16 (Remedy for Personal Information Infringement)

If you need to report any infringement of personal information or have any inquiries thereon, please feel free to contact any of the following organizations.

1. Personal Information Dispute Resolution Commission (www.kopico.go.kr/02-1833-6972)
2. Korea Internet & Security Agency (privacy.kisa.or.kr/ without an area code 118)
3. Korea Association for ITC Promotion (www.eprivacy.or.kr/02-550-9500)
4. High-Tech Crimes Investigation Department of Supreme Prosecutors' Office (www.spo.go.kr/ without an area code 1301)
5. Cyber Bureau (cyberbureau.go.kr/ without an area code 182)

Article 17 (Personal Information Manager and Officer)

① The Bank's Personal Information Protection Officer appointed in accordance with Article 31 Paragraph 1 of Personal Information Protection Act is as shown below.

	Personal Information Protection Officer
Position	Chief Risk Officer
Name	Thomas De Montmarin
Tel/FAX	02-2004-0006/ 02-6716-0239

② The Bank's department and employee in charge of receiving and processing requests to inquire personal information are as shown below.

Department	Position	Name	Tel/FAX	Service Hour

Customer Center	Assistnat Vice President	Nam Gu Kim	02-2004-0043 02-6716-0242	09:00~17:00 Mon through Fri (Holidays excepted)

③ If the Bank newly appoints or changes the existing Personal Information Protection Officer or employee in charge of handling personal information inquiry requests, the information on the new appointment and contact details will be notified via the internet webpage of the Bank [http://www.hsbc.co.kr].