



HLBCAM PRIVACY NOTICE

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BACKGROUND

Hong Leong Bank (Cambodia) PLC sets out the following Privacy Notice which outlines the purpose, types, disclosures, rights to access and correction, as well as confidentiality to customer's personal data collected.

The purpose of this Privacy Notice is to explain to you:

- The type of Data we collect and how we collect it;
- How we use your Data;
- The parties that we disclose the Data to;
- How we store your Data; and
- How we intend to deliver the rights and protection that you are entitled to, including how to access and update your Data.

1. PERSONAL DATA CONFIDENTIALITY

1.1 We strive to protect the confidentiality of the personal data (“Data”) of customers, employees, vendors/service providers and business counterparts (“data subjects” or “you”), that has been provided to us.

1.2 This Privacy Notice is for individual customers and individuals in a company/enterprise that has/had a commercial relationship with us. This includes individual guarantor, director, shareholder, authorised signatories/dealer, obligor, company secretary, beneficial owners (e.g. sole proprietor and partners) or any authorised representative of the company/enterprise (the “Relevant Parties” or “you”). Please ensure that this Privacy Notice is available to the Relevant Parties in your company/enterprise, if you are representing them.

1.3 Ensuring the security of your Data is our priority. In order to protect the confidentiality of this Data, we implemented physical, electronic, procedural safeguards including investment in systems and infrastructure to ensure data security. Each of our employees are also bound by our Code of Conduct and Ethics that requires them to maintain the confidentiality of customer data at all times.

1.4 Any company(ies) that we engage to provide services to you, for and on our behalf (“service providers”), are required to protect the confidentiality of your Data.

1.5 In relation to Clause 1.4 above and Clause 4.2 below, please understand that we may share your Data with our service provider(s) and business partners in accordance with this Privacy Notice.

2. CHOICE TO SUPPLY PERSONAL DATA

2.1 Your data is needed to enable us to process your application for our products or services. Should you decline to provide such Data, we may not be able to provide products and/or services (e.g. account opening form, loan/financing application form).

2.2 We may send latest marketing and promotional offers to meet your financial needs and objectives such as product or service upgrades, credit increases and other additional benefits. Should you choose not to receive these marketing and promotional offers, you can do so by informing us and your request will be processed free of charge.

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3. TYPES OF PERSONAL DATA COLLECTED

3.1 Personal Data Protection Act 2010 describes personal data as information relating directly or indirectly to an individual who is identified or can be identified from that information.

3.2 The types of Data we collect may vary according to the business relationship that is established. Data collected may include the following:

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| a) | Information that you have provided in applications or other forms such as name, identity card number or passport number (for foreigners), address, e-mail address, telephone number, occupation, financial position such as assets and income, investment objectives, employer details and other relevant information for your application; |
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b)	Information about your transactions with us, our service providers, business partners or third parties (e.g. your account balances, payment history and account activity);
c)	Information from credit bureau reports and credit reporting agencies;
d)	Information from governmental agencies, regulatory and statutory authorities;
e)	Information from your joint accountholder(s) and/or parties providing security for your facilities and/or all such persons named in your application for our products and services. This includes persons named in documents submitted in support of your application including but not limited to your family members, directors, individual shareholders, authorised signatories and guarantors. You confirm and warrant that you have obtained the consent of all such individuals mentioned prior for their respective Data to be processed by us;
f)	Information obtained from your access to our website (e.g. your computer's IP address and cookies). We may use cookies for a number of purposes, such as to analyse your preference, for us to provide you with products and services, to improve our products and/or to personalise our services to you. If you do not wish to enable cookies, you may change the settings on your browser and/or mobile device;
g)	Information for insurance/takaful products;
h)	If you have or are a party to more than one account with us, we may link all your accounts and Data to enable us to have a holistic picture of your relationship with us;

i)	Recorded footage from Closed Circuit Televisions ("CCTV") installed at our premises and self-service terminals;
j)	Images (including photographs), video and/or audio recordings at our premises or at events organised by or for the Hong Leong Group of Companies; and
k)	Information from publicly available sources.

4. USE OF PERSONAL DATA

4.1 We collect your Data to provide you with the requested financial services or products, and to meet your financial needs and objectives.

4.2 In addition to the above, we may collaborate with our business partners to jointly develop products and services or launch marketing campaigns that may involve the sharing of your Data.

4.3 Your Data may be used or processed by us, or our service providers for the following purposes:-

a)	To establish a relationship between you and the Bank and/or companies related to or affiliated to us, our service providers and business partners;
b)	To process applications for products and services;
c)	To evaluate and monitor credit/financing worthiness;

d)	To facilitate and assist you on withdrawals from Employees Provident Fund, in connection with any loan/financing application or investment with us;
e)	For evaluation, due diligence and screening purposes;
f)	For the provision of products and services to you, whether through face-to-face banking or through electronic means, including processing of receipts and payments, automatic teller machine/cash deposit machine services, and credit and charge cards;
g)	To conduct research for analytical purposes including but not limited to data mining and analysis of your transactions with us;
h)	To evaluate and monitor provision of products and services;
i)	To respond to inquiries or complaints from you and for dispute resolution;
j)	To administer offers, competitions and promotions;
k)	For the research and development of products and services for customers' use;
l)	To allow us, our related and/or affiliated companies, service providers and business partners to promote their products and services;
m)	For debt collection purposes;
n)	For enforcement or defense of our rights and obligations of other parties to us and/or our affiliates;

o)	To prevent fraud or detect crime or for the purpose of investigation;
p)	For assessing, processing and investigating insurance/takaful risks and claims;
q)	For deposit insurance/takaful purposes;
r)	To enable a party to evaluate any actual or proposed assignment, participation, sub-participation and/or novation of our rights and/or obligations;
s)	To meet legal and regulatory requirements, which may include disclosure, notification and record retention requirements;
t)	To maintain and protect our premises and all self-service terminals;
u)	For audit and risk management;
v)	For any proposed or actual merger, sale, transfer or proposed transfer of any part of our interests, assets, obligations, business and/or operations;
w)	To conduct credit checks (including but not limited to upon any application of our loan/financing products and upon periodic or special review of the loan/financing which will normally take place once or more every year);
x)	To fulfil the direction and/or to provide co-operation with any governmental authority and/or agencies of any country and/or jurisdiction;
y)	For such other purposes as permitted by applicable law or with your consent; and

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| z) | For all other purposes incidental and associated with any of the above. |
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4.4 CCTV footage, photos and/or images in particular, may also be used for quality assurance purposes, detecting and deterring crime or suspicious, inappropriate or unauthorised use of our facilities, products, services and/or premises and conducting incident investigations.

5. DISCLOSURE OF PERSONAL DATA

5.1 For the purposes above and for the purpose of assisting you, your Data may be provided to:-

a)	Any person under a duty of confidentiality to us or to companies related to, or affiliated to us (whether such company operates in Cambodia);
b)	Any financial institution granting or intending to grant any credit/financing facilities to you, the Credit Bureau Cambodia or any other established by Bank Negara Malaysia, Cagamas Berhad, Credit Guarantee Corporation Malaysia Berhad, any other relevant authority as may be authorised by law to obtain such information, authorities/agencies established by Bank Negara Malaysia and/or any other person as may be authorised by law or any governmental authority and/or regulatory authority and/or any industry related association;
c)	Companies and/or organisations (including their authorised representative) which are our agents, affiliates, service providers and/or business partners, in or outside Malaysia;

d)	Your advisers (including but not limited to accountants, auditors, lawyers, financial advisers or other professional advisers) where authorised by you;
e)	Any guarantors, security providers or any person intending to settle any outstanding amounts under the facility(ies) granted by us to you;
f)	Lawyers, auditors, tax advisors, investment banks and other professional advisors appointed by us;
g)	Any financial or other institution with which you have, or proposed to have dealings with;
h)	Any credit reference agency, debt collection agencies, rating agency correspondents, direct or indirect provider of credit protection and fraud prevention agencies;
i)	Any insurance company/takaful operators, brokerage and any association or federation of insurance companies/takaful operators;
j)	Any person or corporation to whom we merge/transfer/sell or proposed to merge/transfer/sell any part of its interests, assets, obligations, business and/or operations;
k)	Any nominee, trustee, co-trustee, centralised securities depository or registrar, custodian, estate agent, solicitor or other person who is involved with the provision of services or products by us to you;
l)	Any governmental authority and/or agencies of any country or jurisdiction (when required);
m)	Any person by whom we are required by applicable legal, governmental or regulatory requirements to make disclosure; and

- n) Any other person reasonably requiring the same in order for us to carry out the activities set out in the above purposes.

5.2 In the course of processing, we may transfer your personal data to places outside of Malaysia in order for us to provide you with the service that you have requested. By providing your personal data to us, you agree to such transfer. Rest assured that the privacy of your personal data is paramount to us and we shall take all necessary precautions to keep your personal data safe.

6. RIGHT TO ACCESS AND CORRECT PERSONAL DATA

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6.1 You are entitled to ask whether we hold any of your Data, request access and correction of any such Data held. You will be required to fill up a form (in electronic or physical format) and a reasonable administrative fee may be charged for processing each data access request.

7. AMENDMENTS TO PRIVACY NOTICE

7.1 This Privacy Notice may be reviewed and amended from time to time. We will communicate such changes along with the updated Privacy Notice on our website (www.hlb.com.kh), and/or other appropriate communication means as may be determined by us.

8. CONTACT US

8.1 If you have any questions on this Privacy Notice, how we handle your Data or how to access your Data, kindly contact our call centre;

E-mail	hlbkhcomp@hlbkh.hongleong.com
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