

Dear person of contact,

This data protection information notice (the Data Protection Information Notice) has been drawn up in connection with the obligation to provide information arising under Article 13 and Article 14 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, ("GDPR")).

China Construction Bank (Europe) S.A. a public limited liability company (*société anonyme*) organized and established under the laws of the Grand Duchy of Luxembourg (**Luxembourg**), having its registered office at 1, Boulevard Royal, L-2449 Luxembourg and registered with the Luxembourg Trade and Companies Register under number B 176131 (hereafter "CCBEU" or "we" or "us" or the "Bank") cares about you as a data subject and puts all necessary endeavours to protect your personal data and to inform you about how we treat your personal information in connection to our business relationship.

As a data controller within the meaning of the GDPR, it is our responsibility to inform our Customers, as data subjects, on how we use and process their personal information from both an administrative and a technical perspective.

CCB EU and its Branches are required to collect and process data from third parties such as shareholders to our group entities, representatives of companies linked and in cases connected persons to our employees (refereed together as Connected Persons").

In all the aforementioned cases, the reason for this collection of data and its processing is linked to a regulation (in financial markets, protection of the market, customer or investor protection, anti-money laundering and counter terrorist financing and other rules applicable to our institution in the European Union).

For this reason we process personal data such as *i*) identification data, *ii*) financial data, *iii*) contact details and *iv*) family relationships.

In some specific cases across our network, we request information from connected person to employees<sup>1</sup>. This happens whenever at least one of the following criteria are met: *i)* Activities of the respective CCB office (e.g. Mergers and Acquisitions, dealing with financial instruments, assisting with acquisition financing, assisting for initial offerings or listing...); *ii)* Exposition to confidential information according to employment duties (e.g. Participation on management committees, boards, members of certain controlling functions, heads of department...) and/or *iii)* the employee is part of an insider list due to a particular project.

In the cases explained above, and following the Delegated Regulation 2017/565 Articles 28 and

<sup>&</sup>lt;sup>1</sup> When the defined cases apply, this may include parents and your siblings as well as other persons in your household among others.



29 together with EU regulation No 596/2014 Article 3 (26) we are obliged to collect, process and store information on Connected Persons referred to their brokerage activity and other investments, as part of the compliance with the aforementioned rules.

This data is not further processed after the conclusion of our obligations as a bank.

According to the mentioned regulations and the specific cases, data will be retained for 10 years after the finalisation of the regulatory reason for collecting it and processing it, or for a period of 3 years after the end of the employment relationship.

We have put in place all administrative and technical measures available to protect your data and ensure that is only used for the reasons and purposes defined in the respective laws.

Your data is in general not shared with third parties, with the following few exceptions: Audit firms in connection with regulatory audits, our teams for the purposes defined in the respective European rule (or modified by local rules) to the local and European authorities which lawfully request such data and in exceptional basis with other persons when mandated to do so via an administrative or judicial order.

The Personal data collected includes i) identification data (e.g. Name, surname) ii) Contact details iii) Financial data (e.g. when required by law we request information related to investments), iv) financial information for the compliance with the contractual obligations of CCBEU, v) certain family information such as name of partner, information on children and other family members in order to comply market and investor protection law, and viii) images for anyone accessing our premises

Should we require collecting or further processing data we ensure that lawfulness is present and we will either communicate to you the conditions or request your specific consent as applicable.

We do not collect sensitive data beyond any legal obligation, judicial request or for the purpose of the compliance with a contract. The data that we collect from vulnerable data subjects (e.g. children or persons connected to you) is treated with the highest standards of security and minimised in access to protect them. Please note that we have a dedicated notice for vulnerable data subjects, which is less detailed but more explicative of the main points as is designed for such audience.

In the case of certain functions and members of management, we further communicate data with repositories and counterparties (e.g. the trade register in Luxembourg, the Register of beneficial owners as applicable, financial institutions requiring disclosure of key functions as part of their Know your customer/counterparty process, and similar entities on each location where the Bank has activities and presence).

Remember that you have certain rights according to GDPR, those rights include i) right of access to your personal data, ii) right to obtain the rectification of your personal data when our record



are incorrect iii) right to request from the Bank deletion of your personal data (as far as such data is not covered by a legal or regulatory retention period)

For any other type of processing we will ensure that you are informed and that your consent is collected when required.

You can always contact us on following the procedure here bellow, in the same manner that you can contact the data protection authority of your location or the National Data Protection Commission in Luxembourg (In case you are not located in Luxembourg, you are allowed to interpose any complaint via the Data Protection Authority of your location) at <a href="https://cnpd.public.lu/en/particuliers/faire-valoir.html">https://cnpd.public.lu/en/particuliers/faire-valoir.html</a> or by post at 15 avenue du Jazz L-4370 Belvaux; we encourage you to bring to our attention all your concerns before contacting any authority.

If you have a particular question about your data, want to contact us or simply wish to materialise one of your rights under GDPR, please contact us by email to <a href="mailto:dpo@eu.ccb.com">dpo@eu.ccb.com</a> or by postal services at our address 1 boulevard Royal L-2449 Luxembourg to the attention of our Data Protection Officer

This notice is updated and amended from time to time, case in which will be published in our website and/or communicated to you via the person or institution that makes you a Connected Person to CCB EU or its Branches.

Best regards,

**CCBEU Data Protection Officer**