
Dear connected person to a customer or potential customer,

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.

All those connected persons to our customers or prospects are referred here below as “Customer”.

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.

As a Customer we process your data for a number of purposes and reasons which will be explained in this notice. If after reading it you have further questions, please contact our data protection officer (“DPO”) using the contact details provided herein.

From the moment we enter into contact, we consider your personal data as a key element in developing trust and long lasting relationships. Therefore we give preeminent importance to the processing of such data in a transparent and secured manner. We further commit to take all necessary measures to protect your rights.

As a data processor within the meaning of the GDPR, our processing of personal data follows the strictest requirements of the applicable rules and regulations (*e.g.*, rules/laws on fraud prevention, anti-money laundering, investor protection, and market abuse *etc.*); while limiting the processing to the minimum personal data required for each activity..

For certain products and services, we will process other data belonging to our Customers and their counterparties (*e.g.* financial data linked to other institutions, professional information and some specifics for compliance with tax rules such as CRS and FATCA) in order to comply with our agreements, your orders and your requests.

In exceptional cases, we collect and process your personal data for public interest purposes (*e.g.* information described in EU directives, EU regulations and other legal texts such as those relating

to data protection, anti-money laundering and which set out the legal framework for processing your data).

In some situations, we process your data for legitimate interest purposes (e.g. reporting to the group to which we belong, communicating between branches and subsidiaries or protecting our reputation or assets). In those cases you can contact us to get more details about such processing.

In order to comply with our legal obligations (including Customer identification), we may collect data relating to Customers directly from them, but also from third parties, such as data providers, public registers and other aggregators (e.g. Thomson Reuters or Dow Jones) which help financial institutions to comply with their obligations.

Please note that in other cases than the abovementioned, your consent is required for the purpose of the collection and processing of your data and that such consent can be withdrawn at any time.

The data collected for compliance with Know Your Customer obligations is retained for a period of 5 years as from the end of the business relationship (save for legal exceptions), while transactional data is kept for 10 years to comply with accountancy rules and record keeping obligations.

Persons connected to our Customers (e.g. ultimate beneficial owners, holder of key functions, contact persons, shareholders, directors, and power of attorney holders etc.) will see their personal data processed in cases such as, (i) identification and verification needs (legal obligation), (ii) when producing orders on behalf of the relevant Customer (legal obligation and required for delivering our products and services), (iii) for information regarding the requested services (following rules such as MiFID, MAR, FATCA, AMLD, and others) or (iv) in cases following the course of business or when applicable collecting their consent.

When instructed by a Customer to contact you, we rely on the Customer to ensure that the relevant contact instruction or request is in compliance with all the requirements of personal data protection and other applicable rules according to your jurisdiction. This obligation is part of our contractual arrangements with the Customer, and more specifically section 15 of our terms and conditions.

For the collection and management of consent, the relevant Customer is in charge of collecting, maintaining, updating and when necessary providing to us the evidences of such consent.

As it is the Customer's prerogative to designate roles and responsibilities within its organisation, we will perform our activities under the descriptions provided by the Customer which ensures the accuracy and validity of such information.

If you happen to visit our offices, please be informed that we maintain a system of video

surveillance and if you call us, remember that certain actions will require recording our conversations (e.g. when sending orders or requesting information via phone).

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.

To comply with reporting obligations, we transfer data of our Customers to local authorities (including the financial regulator of our location, the Data Protection Authority, the tax authorities, the Luxembourg Central Bank and other central banks *etc.*).

A limited amount of third parties may have access to your data including judicial courts and lawyers in certain cases, external auditors, some consultants when the mission requires such access and with further measures for data protection), payment services providers, brokers and other financial institutions or professionals of the financial sector.

In every case we ensure that technical and administrative measures are taken to protect your personal data and we act under the specific rules of professional secrecy applicable as per the Law of 5 April 1993 on the Financial Sector, as amended (“LSF”), in Luxembourg, or as per local rules in the case of our branches.

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).

In general, we retain personal data for a period of 10 years after the end of our relationship, with certain exceptions such as our video recording system and voice recording devices for which the retention period is shorter (e.g. 8 days for video surveillance), or information linked to customer identification or verification of identity (retained in general for 5 years as described above).

If you wish to have more details about the data processed or the retention periods applicable, feel free to contact CCB EU DPO as mentioned herein.

We may also transfer your personal data to our group entities but always in compliance with local regulations (such as professional secrecy as described in article 41 of the LSF), with technical, organisational and contractual arrangements aiming at protecting your data.

For such transfer to the Bank limits itself to 3 basic cases i) when we hold a legal requirement for such transfer, ii) when is needed for compliance with our agreements with you and iii) when we

have analysed the legitimate interest of the Bank and the conclusion was positive for such transfer.

Please note that you have certain rights under the GDPR, including i) a right of access to their personal data, ii) a right to obtain the rectification of their personal data when their record are incorrect, and iii) a right to request from the Bank the deletion of their 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.

Please note that you can contact the data protection authority of your location or the National Data Protection Commission in Luxembourg as part of the one stop mechanism visiting their website <https://cnpd.public.lu/en/particuliers/faire-valoir.html> or by post at 15 avenue du Jazz L-4370 Belvaux, Grand Duchy of Luxembourg; 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 the GDPR, please contact us by email to dpo@eu.ccb.com or by postal services at our address 1 Boulevard Royal L-2449 Luxembourg to the attention of our DPO.

This notice is updated and amended from time to time and will be published on our website. Please remember to keep yourself informed at all times by visiting our website.

Best regards,

CCBEU Data Protection Officer