

尊貴的客戶：

## 修訂《有關個人資料(私隱)條例之客戶通告》

隨附我們《有關個人資料(私隱)條例之客戶通告》的更新版本(「**個人資料通告更新版**」)。

個人資料通告更新版解釋我們如何收集、處理及分享您的個人資料，以作為我們向您提供的服務之一部分。我們須按照《個人資料(私隱)條例》(「**私隱條例**」)處理您的個人資料。

個人資料通告更新版包含關於香港兩項重要發展的變更。

### 多家個人信貸資料服務機構營運模式

多家個人信貸資料服務機構營運(「**MCRA**」)模式是由香港銀行公會、香港有限牌照銀行及接受存款公司公會及香港持牌放債人公會制訂的一項重要新措施。

當您提出按揭、貸款或其他信貸產品或服務的申請時，銀行將向個人信貸資料服務機構(「**信貸資料服務機構**」)索取關於您的信貸報告。信貸資料服務機構收集關於您現時及過往從各家向您提供貸款的債權人借貸的資料，然後將該等資料提供予潛在貸款人，助其評估您的信貸能力。香港現時只有一家個人信貸資料服務機構。MCRA模式將讓貸款人得以透過多於一家信貸資料服務機構共用個人信貸資料。

根據MCRA模式的規定，獲選信貸資料服務機構不得在未經客戶同意的情況下將信貸資料轉移至香港境外。

MCRA模式將於2022年年底投入服務。

### 第三階段開放應用程式介面框架

在香港金融管理局的開放應用程式介面框架下，銀行使用名為應用程式介面(「**API**」)的技術與金融科技企業及其他第三方服務供應商(「**TSP**」)合作交換資料。

上述開放API框架按階段推行。第一階段於2019年1月推行。第一階段API允許銀行與TSP分享關於銀行產品的公開資料。

第二階段開放API框架於2019年10月推行。第二階段API允許銀行透過客戶與TSP的接觸互動接收客戶的銀行產品及服務申請。

第三階段開放API框架於2022年3月開放給公司和中小型企業客戶，並將於2022年6月開放給零售客戶。第三階段API允許銀行在經您同意後與TSP分享客戶帳戶資料，以讓TSP向您提供您所訂購的服務。您同意與TSP分享的客戶帳戶資料(其中可能包括您的帳戶結餘及交易資料)屬您的個人資料。

### 個人資料通告更新版所作變更的總結

以下為個人資料通告更新版所作主要變更的概要：

#### 1. 個人資料通告更新版 – 有關MCRA模式的變更

個人資料通告更新版包含關於在MCRA模式下對個人信貸資料進行收集及披露的變更：

##### (a) 第(c)段 – 向信貸資料服務機構收集個人資料

個人資料通告更新版第(c)段涉及我們從信貸資料服務機構(作為其個人信貸報告服務一部分)接收個人資料的事宜。

##### (b) 第(e)(v)段 – 向平台營運商披露資料

我們於第(e)(v)段清晰說明作為MCRA模式的一部分，您的個人信貸資料可能會被轉移至構成MCRA一部分的中央平台之營運商。

##### (c) 第(g)段、第(j)至(l)段及第(p)段 – 信貸資料服務機構的複數表述(僅適用於個人資料通告更新版的英文版本)

個人資料通告更新版第(g)段、第(j)至(l)段及第(p)段以複數形式表述信貸資料服務機構一詞，以表示您的個人信貸資料將在MCRA模式下被轉移至多家(而非僅一家)信貸資料服務機構。

#### 2. 經修訂個人資料通告更新版 – 關於第三階段開放API合作的變更

經修訂個人資料通告範文亦收納了一段新內容，即第(i)段，其中涉及您對聘用TSP使用透過我們第三階段API所取得的資料而向您提供服務的選項。若您有所指示，我們將根據您所給予的特定同意向相關TSP披露您的客戶資料。

請注意，第(i)段包含關於將您的資料披露予TSP的一般條款。我們將另行向您發出更具體的通知並徵求您的特定同意，以符合私隱條例的規定。

若您就作為相關服務一部分對您的個人資料所作的使用有任何疑問，敬請聯絡我們或您的TSP。

如有任何查詢，歡迎閣下致電**客戶服務熱線(852) 277 95533**或聯絡分行職員。

中國建設銀行(亞洲)股份有限公司 謹啟

2022年7月

此乃電腦列印文件，故不需簽署。

Dear Valued Customer,

## Amendments to our Notice to Customers relating to the Personal Data (Privacy) Ordinance

We are attaching an update to our "Notice to Customers relating to the Personal Data (Privacy) Ordinance" (the "Updated PICS"). The Updated PICS explains how we collect, process and share your personal data as part of our services to you. We are required to handle your personal data in accordance with the Personal Data (Privacy) Ordinance (the "PDPO").

The Updated PICS includes changes that relate to two important developments in Hong Kong:

### MCRA Model

MCRA model is an important new initiative developed by the Hong Kong Association of Banks, the DTC Association and the Hong Kong S.A.R. Licensed Money Lenders Association.

When you apply for a mortgage, loan or other credit product or service, the bank will seek a credit reference report about you from a consumer credit reference agency ("CRA"). CRAs collect information about your past and present borrowing from various creditors who have made loans to you, and then provide this information to potential new lenders to help them assess your creditworthiness. At present, there is only one CRA in Hong Kong. The MCRA Model enables lenders to share and use consumer credit data through more than one CRA.

Selected CRAs will not be allowed to transfer credit data outside Hong Kong without customer's consent under the requirements of the MCRA Model.

The MCRA Model will be launched by the end of 2022.

### Phase III of the Open API Framework

Under the Hong Kong Monetary Authority's Open API Framework, banks collaborate in the exchange of information with fintechs and other third party service providers ("TSPs") using technology called application programming interfaces ("API").

The Open API Framework has been introduced in phases. In January 2019, Phase I was launched. Phase I API allow banks to share public information about their products with TSPs.

Phase II of the Open API Framework was launched in October 2019. Phase II API allow banks to receive applications for bank products and services from customers through the customer's interaction with a TSP.

Phase III of the Open API Framework was launched in March 2022 for corporate and SME customers and will be launched from June 2022 for retail customers. Phase III API allow banks to share customer account information with a TSP after obtaining your consent, for the purpose of enabling the TSP to provide services to you that you have subscribed. The customer account information that you have consented to share with TSPs, which may include your account balance and transaction information, is your personal data.

### Summary of Changes in the Updated PICS

We have set out an overview of key changes in the Updated PICS below:

#### 1. Updated PICS - changes in respect of MCRA Model

The Updated PICS include changes concerning the collection and disclosure of consumer credit data under the MCRA Model:

##### (a) Paragraph (c) - Collection of Personal Data from CRAs

Paragraph (c) of the Updated PICS refers to our receipt of personal data from CRAs as part of their consumer credit reporting services.

##### (b) Paragraph (e)(v) - Disclosure of Data to Platform Operator

We have made it clear in paragraph (e)(v) that as part of the MCRA Model, your consumer credit data may be transferred to the operator of a centralized platform forming part of MCRA.

##### (c) Paragraph (g), (j) to (l) and (p) - references to CRAs in plural (only applicable to the English version of the Updated PICS)

Paragraphs (g), (j) to (l) and (p) of the Updated PICS refer to CRAs in plural, reflecting that transfers of your consumer credit data will be made to multiple CRAs under the MCRA Model instead of just to one CRA.

#### 2. Amended Template PICS – changes in respect of Phase III Open API collaborations

The Amended Template PICS also incorporates a new paragraph (i), which refers to your choice to engage TSPs to provide services to you using data obtained from us using our Phase III APIs. If instructed by you to do so, we will make a disclosure of your customer data to the TSP in accordance with the specific consent that you have given.

Please note that the wording of paragraph (i) refers to disclosures of your data to TSPs in very general terms. More specific consents and notifications will be separately obtained and made to you in order to meet the requirements of the PDPO.

Please contact us or your TSP if you have any questions about the use of your personal data as part of such services.

For more details, you are welcome to call our **Customer Service Hotline at (852) 277 95533** or **contact our branch staff**.

Yours faithfully,

**China Construction Bank (Asia) Corporation Limited**  
July, 2022

This is a computer printout and no signature is required.