

尊贵的客户：

## 修订《有关个人资料(私隐)条例之客户通告》

随附我们《有关个人资料(私隐)条例之客户通告》的更新版本(「个人资料通告更新版」)。

个人资料通告更新版解释我们如何收集、处理及分享您的个人资料，以作为我们向您提供的服务之一部分。我们须按照《个人资料(私隐)条例》(「私隐条例」)处理您的个人资料。

个人资料通告更新版包含关于香港两项重要发展的变更。

### 多家个人信贷资料服务机构营运模式

多家个人信贷资料服务机构营运(「MCRA」)模式是由香港银行公会、香港有限牌照银行及接受存款公司公会及香港持牌放债人公会制订的一项重要新措施。

当您提出按揭、贷款或其他信贷产品或服务的申请时，银行将向个人信贷资料服务机构(「信贷资料服务机构」)索取关于您的信贷报告。信贷资料服务机构收集关于您现时及过往从各家向您提供贷款的债权人借贷的资料，然后将该等资料提供予潜在新贷款人，助其评估您的信贷能力。香港现时只有一家个人信贷资料服务机构。MCRA模式将让贷款人得以透过多于一家信贷资料服务机构共享个人信贷资料。

根据MCRA模式的规定，获选信贷资料服务机构不得在未经客户同意的情况下将信贷资料转移至香港境外。

MCRA模式将于2022年年底投入服务。

### 第三阶段开放应用程序编程接口框架

在香港金融管理局的开放应用程序编程接口框架下，银行使用名为应用程序编程接口(「API」)的技术与金融科技企业及其他第三方服务供货商(「TSP」)合作交换资料。

上述开放API框架按阶段推行。第一阶段于2019年1月推行。第一阶段API允许银行与TSP分享关于银行产品的公开资料。

第二阶段开放API框架于2019年10月推行。第二阶段API允许银行透过客户与TSP的接触互动接收客户的银行产品及服务申请。

第三阶段开放API框架于2022年3月开放给公司和中小型企业客户，并将于2022年6月开放给零售客户。第三阶段API允许银行在经您同意后与TSP分享客户帐户资料，以让TSP向您提供您所订购的服务。您同意与TSP分享的客户帐户资料(其中可能包括您的帐户结余及事务资料)属您的个人资料。

### 个人资料通告更新版所作变更的总结

以下为个人资料通告更新版所作主要变更的概要：

#### 1. 个人资料通告更新版 – 有关MCRA模式的变更

个人资料通告更新版包含关于在MCRA模式下对个人信贷资料进行收集及披露的变更：

##### (a) 第(c)段 – 向信贷资料服务机构收集个人资料

个人资料通告更新版第(c)段涉及我们从信贷资料服务机构(作为其个人信贷报告服务一部分)接收个人资料的事宜。

##### (b) 第(e)(v)段 – 向平台营运商披露资料

我们于第(e)(v)段清晰说明作为MCRA模式的一部分，您的个人信贷资料可能会被转移至构成MCRA一部分的中央平台之营运商。

##### (c) 第(g)段、第(j)至(l)段及第(p)段 – 信贷资料服务机构的复数表述(仅适用于个人资料通告更新版的英文版本)

个人资料通告更新版第(g)段、第(j)至(l)段及第(p)段以复数形式表述信贷资料服务机构一词，以表示您的个人信贷资料将在MCRA模式下被转移至多家(而非仅一家)信贷资料服务机构。

#### 2. 经修订个人资料通告更新版 – 关于第三阶段开放API合作的变更

经修订个人资料通告范文亦收纳了一段新内容，即第(i)段，其中涉及您对聘用TSP使用透过我们第三阶段API所取得的资料而向您提供服务的选项。若您有所指示，我们将根据您所给予的特定同意向相关TSP披露您的客户资料。

请注意，第(i)段包含关于将您的资料披露予TSP的一般条款。我们将另行向您发出更具体的通知并征求您的特定同意，以符合私隐条例的规定。

若您就作为相关服务一部分对您的个人资料所作的使用有任何疑问，敬请联络我们或您的TSP。

如有任何查询，欢迎 阁下致电 **客户服务热线(852) 277 95533** 或 **联络分行职员**。

中国建设银行(亚洲)股份有限公司 谨启

2022年7月

此乃电脑列印文件，故不需签署。

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.