



WANFUTENG BANK LIMITED

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Data Privacy Policy

Our business is built on trust and your privacy is important to us.

In this policy, 'we', 'us', 'our' and 'WBL' refers to Wanfuteng Bank Limited (CN 300929).

Wanfuteng Bank asks that you read this Data Privacy Policy carefully as it contains important information on who we are, how and why we collect, store, use and share data and personal information, your rights in relation to your personal information and on how to contact us.

BY ACCESSING WANFUTENG BANK'S WEBSITES AND ANY PAGES THEREOF, YOU AGREE TO BE BOUND TO THE FOLLOWING TERMS.

This Data Privacy Policy sets out how Wanfuteng Bank uses and protects any information that you give Wanfuteng Bank when you use our websites. Wanfuteng Bank is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this policy.

The security, protection and privacy of your data is important to us.

Wanfuteng Bank has in place safeguards to secure and protect the personal data stored with us. This policy describes how we may collect, use, disclose, process and manage your data.

How we secure and protect your PII (Personally Identifiable Information) and personal data as well as some of the security, protection and privacy measures have in place protect your privacy are outlined in this Digital Policy.

Wanfuteng Bank may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

Wanfuteng Bank collects, uses and is responsible for certain personal information about you. Wanfuteng Bank ("us", "we", or "our") operates (the "Service"). This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this

Data Privacy Policy, terms used in this Data Privacy Policy have the same meanings as in our Terms and Conditions, accessible on our website.

1 Wanfuteng Data Privacy Principles

1. All PII and personal data will be processed and used lawfully, fairly and in a transparent manner;
2. Personal data will only be collected for the specified reasons or purposes outlined within "How will we use your information" and will not be further processed in a manner that is inconsistent or incompatible with those purposes.
3. Personal data that we collect will be adequate, relevant and limited to what is necessary for the reasons and purposes for which the data is processed. The information we collect is outlined in the section below "What information do we collect about you".
4. We will take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date.
5. Personal data will be kept in a form that permits identification for no longer than is necessary for the reasons and purposes that it was collected for processing or as required by regulatory, compliance and enforcement authorities.
6. We will always hold and process personal data in a manner that ensures appropriate protection, security and privacy. This in the "how do we store personal data" section of this policy.

2 Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected - What we collect

We may collect the following information:

Your Biometrics

In order to allow you to log-in. For example, your photo, facial and voice biometrics, including a recording of your voice, which are stored as algorithms.

Tax Responsibilities

Information relating to your tax responsibilities, so that we can comply with our requirements, and obligations under the various relevant and applicable worldwide tax reporting and compliance requirements to which we must comply.

Business Information

In order to support any business lending or credit facility applications.

For mortgage customers, we may collect information relating to income, ability to support a mortgage, credit risk and credit rating to support your application and assist our lending decisions.

Personal Data

In order to support any business lending or credit facility applications.

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data").

Personal data is data connected to or associated with a natural person that can be used to identify that specific natural person. Some examples of personal data that we may collect are:

- personal details (e.g. name, contact details, residential address, date of birth, identity card/passport details, and/or and education details);
- specimen signature(s);
- financial details (e.g. income, expenses, and/or credit history);
- images, facial, fingerprint, voice biometrics and voice recordings of our conversations with you or CCTV recordings collected in branches and/or cameras on ATM machines;
- employment details (e.g. occupation, directorships and other positions held, employment history, salary, and/or benefits);
- tax and insurance information;
- information about your risk profile, investments, investment objectives, knowledge and experience and/or business interests and assets;
- banking information (e.g. account numbers and banking transactions);
- personal opinions made known to us (e.g. feedback or responses to surveys); and/or
- Information obtained from mobile device with your consent (e.g. device location and information).

3 Information Collected from Other Sources

If you are a client or wish to be a client, we also obtain personal information from other sources you may provide:

- a link to your LinkedIn profile,
- website.

4 The Usage of Data

"Usage Data"

We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP

address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Use of Data

We require those information to understand your needs and provide you with a better service, and in particular for the following reasons but not limited to:

- To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues
- Internal record keeping.
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.

We may use your personal data for our core business purposes, such as:

1. developing and providing banking facilities, products or services (whether made available by us or through us), including but not limited to:
 - executing investments, banking, commercial or other transactions and clearing or reporting on these transactions;
 - carrying out research, planning and statistical analysis; or
 - analytics for the purposes of developing or improving our products, services, security, service quality, and advertising strategies;
2. assessing and processing applications, instructions or requests from you or our customers;
3. communicating with you, including providing you with updates on changes to products, services and banking facilities (whether made available by us or through us) including any additions, expansions, suspensions and replacements of or to such products, services and banking facilities and their terms and conditions;
4. managing our infrastructure and business operations and complying with internal policies and procedures;
5. responding to queries or feedback;
6. addressing or investigating any complaints, claims or disputes;
7. verifying your identity for the purposes of providing banking facilities, products or services;
8. conducting credit checks, screenings or due diligence checks as may be required under applicable law, regulation or directive;
9. complying with all applicable laws, regulations, rules, directives, orders, instructions and requests from any local or foreign authorities, including regulatory, governmental, tax and law enforcement authorities or other authorities;

10. monitoring products and services provided by or made available through us;
11. complying with obligations and requirements imposed by us from time to time by any credit bureau or credit information sharing services of which we are a member or subscriber;
12. creating and maintaining credit and risk related models;
13. financial reporting, regulatory reporting, management reporting, risk management (including monitoring credit exposures), audit and record keeping purposes;
14. enabling any actual or proposed assignee or transferee, participant or sub-participant of Wanfuteng's rights or obligations to evaluate any proposed transaction;
15. enforcing obligations owed to us; and/or
16. seeking professional advice, including legal advice.
17. The PII and personal data we collect will be used to set up your account, customer record and operate your account.
18. This allows us to comply with our legal and regulatory requirements, as well as determine ways we can continue to improve our products and services. We will not collect any personal data from you that we do not need.
19. We will use your personal data in order to verify your identity. To do this, we may need to share some or all of your data with third parties, which may include fraud prevention, anti-money laundering and credit reference agencies (whose details we can share with you on request), law enforcement departments, regulators, government agencies and departments, and the providers of our sales or servicing platforms.
20. We will use and monitor your PII and personal data to prevent fraud and money laundering.
21. We will use your PII and personal data to carry out credit reference agency searches, and develop credit scoring profiles, where it is appropriate to do so.
22. We will use your PII and personal data to communicate and interact with you regarding your account and provide service-related updates and notifications. Where possible we will communicate with you via the app, however there may be times where regulation requires us to contact you in a specific way.
23. We may use your information for marketing purposes, however we will only do this, if you specifically ask us and allow us to do so. This might include using your data to identify products and services that may be of use to you.
24. We will use your biometric information for security purposes, in particular for logging-in to the app, as well as increase security to access certain features.
25. We will use your information to comply with the law, in order to protect ourselves, our customers, or others. Where required we will share information to respond to a court order or other lawful request from a public authority.
26. We will use your data to complete troubleshooting, data analysis, testing, research, and for statistical and survey
27. We may also use personal data for purposes set out in the terms and conditions that detail our relationship with you or our customer.

Use of Personal Data for Marketing Purposes

We may use your personal data to offer you products or services, including special offers, promotions, contests or entitlements that may be of interest to you or for which you may be eligible. Such

marketing messages may be sent to you in various modes including but not limited to electronic mail, direct mailers, short message service, telephone calls, facsimile and other mobile messaging services. In doing so, we will comply with applicable data protection and privacy laws.

In respect of sending telemarketing messages to your telephone number via short message service email, telephone calls, facsimile and other mobile messaging services, please be assured that we shall only do so if we have your clear and unambiguous consent in writing or other recorded form to do so or if you have not otherwise made the appropriate registration of wish to not be solicited. If we have an ongoing relationship with you and you have not indicated to us that you do not wish to receive telemarketing messages sent to you, we may send you telemarketing messages to to your contact related to the subject of our ongoing relationship via short message service, email, facsimile and other mobile messaging services (other than a voice or video call).

You may at any time request that we stop contacting you for marketing purposes via selected or all modes.

To find out more on how you can change the way we use your personal data for marketing purposes, please contact us (please see the "How to contact us" section below).

Nothing in this section shall vary or supersede the terms and conditions that govern our relationship with you.

From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customize the website according to your interests.

Whom We Share Your Personal Information With

We may from time to time and in compliance with all applicable laws on data privacy, disclose your personal data to any personnel of Wanfuteng Bank or to third parties, whether located in Vanuatu or elsewhere, in order to carry out the purposes set out above. Please be assured that when we disclose your personal data to such parties, we require them to ensure that any personal data disclosed to them are kept confidential and secure. Without it, Wanfuteng Bank would be unable to maintain a client account about you, and without that, Wanfuteng Bank cannot do business with you.

For more information about the third parties with whom we share your personal data, you may, where appropriate, wish to refer to the agreement(s) and/or terms and conditions that govern our relationship with you or our customer. You may also contact us for more information (please see the "How to contact us" section below).

We wish to emphasise and stress that Wanfuteng does not share or sell personal data to any third parties and we shall remain fully compliant of any duty or obligation of confidentiality imposed on us under the applicable agreement(s) and/or terms and conditions that govern our relationship with you or our customer or any applicable law. However, Wanfuteng Bank will share personal information with law enforcement or other authorities if required by law.

We may transfer, store, process and/or deal with your personal data outside Vanuatu. In doing so, we will comply with applicable data protection and privacy laws.

5 How Long Your Personal Information Will Be Kept

Data about clients

Wanfuteng will not retain your PII and personal data for any longer than necessary for the practices, reasons and purposes described in this policy.

Regulatory, compliance and enforcement requirements may mandate the retention of your PII and personal data for seven years following the closure of your account. In certain circumstances, we may have to store this data for a longer period.

Cookie data

Cookies are deleted after a maximum of 2 years.

Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. Whilst we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

6 Tracking technologies & Cookies Data

What is a Cookie and its purpose?

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

How We Use Cookies

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

[Click here to read our full Cookie Policy](#)

7 Data Transfer

Trans-Border Data Transfers

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

Please note that we transfer the data, including Personal Data, to the Republic of Vanuatu and process it there.

Your consent to this Data Privacy Policy followed by your submission of such information represents your agreement to that transfer. Wanfuteng Bank will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Data Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

We may transfer your personal information to the following third-party service providers, which are located outside the European Economic Area (EEA), Australia, New ZEALAND, Vanuatu. We do this to help us provide and promote services:

- Google, USA - for analytics and documents.
- Other Service providers may be added from time to time and the Data Privacy Policy will change to reflect this.

Such countries do not all have the same data protection laws. Any transfer of your personal information will be subject to appropriate safeguards to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information.

8 Disclosure of your Personal Data

Occasionally we may share your contact details with other companies and foreign correspondents within and outside the European Economic Area ("EEA"). Apart from that and except as stated in the section headed Trans-Border Data Transfers, we do not disclose your personal data to third parties.

We may employ third party companies and individuals to facilitate our Service (“Service Providers”), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyse the use of our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

9 Legal Requirements

Wanfuteng Bank may disclose your Personal Data in the good faith belief that such action is necessary to:

1. To comply with a legal obligation
2. To protect and defend the rights or property of Wanfuteng Bank
3. To prevent or investigate possible wrongdoing in connection with the Service
4. To protect the personal safety of users of the Service or the public
5. To protect against legal liability

10 Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party’s site. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement.

WE HAVE NO CONTROL OVER AND ASSUME NO RESPONSIBILITY FOR THE CONTENT, PRIVACY POLICIES OR PRACTICES OF ANY THIRD-PARTY SITES OR SERVICES.

You should exercise caution and look at the privacy statement applicable to the website in question. We strongly advise you to review the Data Privacy Policy of every site you visit.

11 Children’s Privacy

Our Service does not address anyone under the age of 18 (“Children”).

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

12 Law

These websites Terms and Conditions and the Data Privacy Policy contain the entire agreement between us in connection with this website and as such shall be governed by and construed in accordance with the laws of the Republic of Vanuatu. You agree to submit any dispute arising out of your use of this web site or associated services to the exclusive jurisdiction of the courts of the Republic of Vanuatu.

We reserve the right to amend these Terms and Conditions, Data Privacy Policy at any time. **IF WE DO AMEND THESE TERMS AND CONDITIONS OR DATA PRIVACY POLICY, YOUR FURTHER USE OF THIS WEBSITE CONSTITUTES YOUR ACCEPTANCE OF THE AMENDED CONDITIONS OF USE AND DATA PRIVACY POLICY.**

13 Controlling Your Personal Information

You may choose to restrict the collection or use of your personal information in the following ways:

- whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes.
- if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at dataprivacy@wanfutengbank.com
- we will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

If you believe that any information, we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect

14 Data Access & Corrections

The Data Protection Laws when applicable also provides to relevant individuals with additional rights, including the right to obtain information on how Wanfuteng Bank processes your personal data, or receives certain information provided in electronic form and/or requests that data be transmitted to a third party, or requests for your information to be erased, object to or restrict the use or processing of your information in some circumstances. These will be subject to ongoing obligations imposed on Wanfuteng Bank pursuant to any applicable law or regulation, and/or Wanfuteng’s Bank legitimate reason or

entitlement to continue processing your information, and/or to refuse that request.

Wanfuteng Bank may charge a fee for processing your request for access. Such a fee depends on the nature and complexity of your access request. Information on the processing fee will be made available to you.

Upon receipt of your written request, we will disclose to you your personal data held by us, we shall correct or delete inaccurate details, and notify any third-party recipients of the necessary changes. Website related requests should be made by e-mail to dataprivacy@wanfutengbank.com.

To answer your query please provide us with:

- enough information to identify you,
- proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

When applicable GDPR provides relevant individuals with additional rights, including

1. require us to correct any mistakes in the information which hold about you.
2. require the erasure of personal information concerning you in certain situations.
3. receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations.
4. object at any time to processing of personal information concerning you for direct marketing.
5. object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
6. object in certain other situations to our continued processing of your personal information
7. otherwise, restrict our processing of your personal information in certain circumstances

15 Changes To This Data Privacy Policy

We may update our Data Privacy Policy from time to time. We will notify you of any changes by posting the new Data Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the “effective date” at the top of this Data Privacy Policy.

You are advised to review this Data Privacy Policy periodically for any changes. Changes to this Data Privacy Policy are effective when they are posted on this page.

16 How to contact us

If you wish to contact us please send an email to dataprivacy@wanfutengbank.com or write to Wanfuteng Bank, Churchill House PO box 65 Kumul Highway Port Vila Vanuatu.

If you are our personal banking customer or a non- customer, you may contact our customer centre officer at (678) 28 880 or email us at dataprivacy@wanfutengbank.com.

As of the date of effectiveness 02 April 2020, unless otherwise notified by us, this Policy will supersede all previously issued one (if any).

Version 02 April 2020