# Shanghai Rural Commercial Bank Co., Ltd.
# Key Points of the Personal Information Protection Policy

In accordance with the *Personal Information Protection Law of the People's Republic of China*, the *Implementation Measures of the People's Bank of China for Protecting Financial Consumers' Rights and Interests* (Order No. 5 [2020] of the People's Bank of China), and the *Measures for the Administration of the Protection of Consumer Rights and Interests by Banking and Insurance Institutions* (Order No. 9 [2022] of the China Banking and Insurance Regulatory Commission), among others, Shanghai Rural Commercial Bank (hereinafter referred to as "the Bank") earnestly safeguards the rights and interests of financial consumers as information subjects, and has formulated rules and policies such as the Bank's *Measures for the Management of Personal Customer Information Protection* and *Policy on the Management of Personal Information Protection*.

## I. Definitions

Personal Customers: Means Refer to natural persons who have business transactions with the Bank or whose relevant information is associated with the Bank. This includes both customers who have opened personal accounts with the Bank, and customers who have not opened personal accounts with the Bank but have established business contacts with the Bank through certain associated methods.

**Personal Information:** Means information related to an identified or identifiable natural person recorded in electronic or other forms, which is obtained by the Bank through business operations or other lawful channels, excluding information after anonymization processing.

**Sensitive Personal Information:** Means personal information that, once leaked or illegally used, is likely to infringe upon the personal dignity of natural persons or endanger their personal or property safety, including information such as biometric data, religious beliefs, specific identity, medical and health information, financial accounts, and personal whereabouts, as well as the personal information of minors under 14 years of age.

## II. Scope of Application

Personal information protection involves units at all levels, including front, middle, and back-office lines, as well as all business fields in each link of the full lifecycle of personal information processing, covering the entire process of ex-ante, in-process, and ex-post stages.

## III. Working Principles

The Bank's personal information protection work adheres to the five major principles of "lawfulness, integrity, openness and transparency", "explicit purpose and minimum necessity", "choice, consent, and subject participation", "ensuring security, and consistency between rights and responsibilities", and "classification, grading, and strict approval".

## IV. Information Processing

The Bank only processes the minimum types and quantities of personal information required to fulfill the purposes of personal information processing, and adheres to the principles of openness and transparency, publicly disclosing its personal information processing rules and explicitly stating the purposes, methods, and scope of processing. Before processing personal information, the Bank will notify personal information subjects of matters such as the processing purposes and processing methods truthfully, accurately, and completely in a prominent manner and in clear, easy-to-understand language.

When processing sensitive personal information, the Bank will also notify the necessity of processing sensitive personal information and the impact on personal rights and interests.

When processing personal information, the Bank will obtain the consent of the individual or their guardian. If the processing purposes, processing methods, or the categories of personal information being processed change, the Bank will obtain consent again. Where the processing of sensitive personal information is based on the consent of personal customers, the Bank will obtain the separate consent of the personal customers.

## V. Retention of Information

In accordance with national regulations on archive management and electronic data management, the Bank takes technical and other necessary measures to properly retain and store the collected personal information, preventing personal information from being lost, damaged, disclosed, or tampered with. The retention period for personal information shall be limited to the shortest period necessary to achieve the purpose of processing. Where laws, regulations, and regulatory authorities provide otherwise with respect to the retention period of personal information, such provisions shall prevail. Upon the expiration of the retention period of personal information, the Bank will delete or anonymize the personal information.

## VI. Rights Requests and Responses

Personal customers have the right to be informed and to make decisions with respect to the processing of their personal information, and have the right to restrict or refuse the Bank's processing of their personal information, except where otherwise provided by laws or administrative regulations.

Personal customers have the right to access, copy, correct, supplement, and delete some or all of their personal information processed by the Bank. When personal customers request to correct or supplement their personal information, the Bank will verify their personal information and correct or supplement it in a timely manner.

Personal customers have the right to request an explanation of the personal information processing rules of the Bank. With respect to personal information processing activities based on the consent of personal customers, the customers have the right to withdraw their consent, and the Bank will provide a convenient method to withdraw consent.

If any individual is dissatisfied with the Bank's personal information protection or finds any issues, they may call the Bank's customer service hotlines at 021-962999 or 4006962999, or send an email to the complaint email address 962999@shrcb.com to lodge complaints or reports. Unless there are exceptional circumstances, the Bank will accept and handle the matter within 15 working days.