



Dear Customer,

敬啟者：

**Notice of Amendments to our Notice to Customers and Other Individuals relating to the Personal Data (Privacy) Ordinance (the “Ordinance”)**

有關修訂《關於個人資料(私隱)條例(「條例」)的客戶及其他個別人士通知》的通知

We are pleased to inform you that our Notice to Customers and Other Individuals relating to the Personal Data (Privacy) Ordinance (the “Ordinance”) (the “**Revised Notice**”) has been updated and will take effect on 1 September 2022..

茲通知我們已修訂《關於個人資料(私隱)條例(「條例」)的客戶及其他個別人士通知》(「個人資料聲明修訂版」)，有關聲明將於 2022 年 9 月 1 日生效。

The Revised Notice 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**”).

個人資料聲明修訂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。

The Revised Notice includes changes that relate to two important developments in Hong Kong:

個人資料聲明修訂版包含關於香港兩項重要發展的變更。

**MCRA Model**

**MCRA 模式**

**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.

**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。

When you apply for a mortgage, loan or other credit product or service, the relevant 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.

當您提出按揭、貸款或其他信貸產品或服務的申請時，有關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新貸款人，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。

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

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。

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

MCRA 模式將於 2022 年年底投入服務。

### **Phase III of the Open API Framework**

#### **第三階段開放應用程式介面框架**

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**").

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。

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.

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。

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.

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。

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.

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。

## **Summary of Changes in the Revised Notice**

### **個人資料聲明修訂版所作變更的總結**

We have set out an overview of key changes in the Revised Notice below:

以下為個人資料聲明修訂版所作主要變更的概要：

#### **1. Changes in respect of MCRA Model**

##### **有關 MCRA 模式的變更**

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

個人資料聲明修訂版包含關於在 MCRA 模式下對個人信貸資料進行收集及披露的變更：

(a) **Paragraph (d) – Collection of Personal Data from CRAs**

**第(d)段——向信貸資料服務機構收集個人資料**

Paragraph (d) of the Revised Notice refers to our receipt of personal data from CRAs as part of their consumer credit reporting services.

個人資料聲明修訂版第(d)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) **Paragraph (f)(vi) – Disclosure of Data to Platform Operator**

**第(f)(vi)段——向平台營運商披露資料**

We have made it clear in paragraph (f)(vi) 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.

我們於第(f)(vi)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) **Paragraph (d) to(g), (i),(k) to (m) and (p) – references to CRAs in plural**

**第(d)段至(g)段、第(i)、(k)段至(m)段及第(p)段——信貸資料服務機構的複數表述**

Paragraphs (d) to (g), (i)(k) to (m) and (p) of the Revised Notice 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.

個人資料聲明修訂版第(d)至(g)、第(i)段、第(k)至(m)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. Changes in respect of Phase III Open API collaborations**

**關於第三階段開放 API 合作的變更**

The Revised Notice also incorporates a new paragraph (j), 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.

個人資料聲明修訂版亦收納了一段新內容，即第(j)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。

Please note that the wording of paragraph (j) 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.

請注意，第(j)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。

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

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。

Thank you for your valued support and we look forward to continuing to serve you.

我們感謝閣下一直以來的支持，並期待繼續為閣下服務。

August 2022