



**MUFG BANK, LTD.**

## **PERSONAL DATA PROTECTION POLICY**

We at MUFG Bank Ltd., Singapore Branch (“**the Bank**”), take our responsibilities under Singapore’s Personal Data Protection Act 2012 (the “**PDPA**”) seriously. We also recognise the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Personal Data Protection Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the “**DPO**”) at:

***Personal\_Data\_Protection@sg.mufg.jp***

### **1 INTRODUCTION TO THE PDPA**

1.1 “Personal Data” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, account information, photographs and video images.

1.2 We will collect your personal data in accordance with the PDPA. We will notify you of the **purposes** for which your personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless there are exceptions under the law that permit us to collect, process, and disclose your personal data without your consent.

### **2 PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA**

2.1 The personal data which we collect from you may be collected, used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your personal data, including (to the extent applicable) :

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- a) processing your application with us for any products, facilities and/or services offered to you pursuant to the Terms and Conditions;
- b) facilitating, processing, dealing with, administering, managing and/or maintaining your relationship with us, performance of the Terms and Conditions and enforcing the Bank's rights and obligations thereunder;
- c) carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf;
- d) communicating with you via phone/voice call, text message, fax message, email and/or postal mail for the purposes of administering and/or managing your relationship with us, such as but not limited to the administration of your account or processing your transactions or the services or products you are entitled to or may be offered under your contract with us. You acknowledge and agree to such communication by the Bank;
- e) performing verification of your financial standing through credit reference checks;
- f) managing the Bank's infrastructure and business operations and/or to carry out or perform administrative, operational and technology tasks (including technology infrastructure maintenance and support, application maintenance and support, risk management, systems development and testing), and business continuity management as well as complying with policies and procedures including those related to auditing, finance and accounting, billing and collections;
- g) to detect, prevent and investigate any fraud, bribery, corruption or any act or omission which constitutes violation of any law, to carry out due diligence or other screening activities as required by law or regulations or our risk management procedures in order to meet the Bank's compliance obligations;
- h) to comply with any applicable law, governmental or regulatory requirements including meeting the requirements of any guidelines by regulatory authorities (in Singapore or elsewhere), requests or order by any governmental authorities, public agencies, ministries, statutory bodies including but not limited to defending and/or enforcing the Bank's rights and remedies under the law;
- i) conducting research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve our products, services and facilities for your benefit and/or to enhance your experience with us as our customer;
- j) storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore; and
- k) any other purposes which we notify you of at the time of obtaining your consent.

(collectively, the "**Purposes**")

There may be purposes other than the Purposes set-out above, for which your personal data may/will be collected, used, disclosed or processed. In such case, we will notify you of such other purposes at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.

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2.2 In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, and/or other third parties whether situated in Singapore or outside of Singapore, for one or more of the above-stated Purposes. Such third party service providers, agents and/or affiliates or related corporations and/or other third parties would be processing your personal data either on our behalf or otherwise, for one or more of the above-stated Purposes.

### 3 **SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

3.1 We respect the confidentiality of the personal data you have provided to us.

3.2 In that regard, we will not disclose your personal data to third parties without first obtaining your consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following :

- (a) cases in which the disclosure is required or authorised based on the applicable laws and/or regulations;
- (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
- (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- (d) cases in which the disclosure is necessary for any investigation or proceedings;
- (e) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
- (f) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or
- (g) where such disclosure without your consent is permitted by the PDPA or by law.

3.3 The instances listed above at paragraph [3.2] are not intended to be exhaustive. For more information on the exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA which is publicly available at <http://statutes.agc.gov.sg>.

3.4 Where we disclose your personal data to third parties with your consent, we will employ our best efforts to require such third parties to protect your personal data.

#### **4 REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA**

- 4.1 You may request to access and/or correct the personal data currently in our possession by submitting your request to ***Personal\_Data\_Protection@sg.mufg.jp***.
- 4.2 For a request to access personal data, we will provide you with the relevant personal data within 30 days from such a request being made.
- 4.3 For a request to correct personal data, we will correct your personal data as soon as practicable after the request has been made unless we have reasonable grounds not to do so; and
- 4.4 We may charge you a reasonable fee for the handling and processing of your requests to access and/or correct your personal data.

#### **5 REQUEST TO WITHDRAW CONSENT**

- 5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by submitting your request to ***Personal\_Data\_Protection@sg.mufg.jp***.
- 5.2 We will process your request within 30 days from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.
- 5.3 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your existing relationship with us.

#### **6 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA**

- 6.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by the Bank to make a decision that affects you, or disclosed to another organisation. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from you not updating us of any changes in your personal data that you had initially provided us with.
- 6.2 We will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.
- 6.3 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention

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of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

## 7 COMPLAINT PROCESS

7.1 If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.

7.2 Please contact us through one of the following methods with your complaint or grievance :

(a) E-mail : ***Personal\_Data\_Protection@sg.mufg.jp***  
To the attention of the 'Data Protection Officer'.

(b) Office address : 7 Straits View  
#23-01 Marina One East Tower  
Singapore 018936  
Attention it to the 'Data Protection Officer'

7.3 Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our organisation to handle. For example, you could insert the subject header as "**PDPA Complaint**".

7.4 We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

## 8 UPDATES ON PERSONAL DATA PROTECTION POLICY

8.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.

8.2 We reserve the right to amend the terms of this Personal Data Protection Policy at our absolute discretion.

8.3 Please contact us if you require an update on this policy by emailing to us at ***Personal\_Data\_Protection@sg.mufg.jp***.