

MUFG Bank (China), Ltd.

Privacy Policy for Institutional Clients

Thank you for using the products and services provided by MUFG Bank (China), Ltd. and its branches (collectively referred to as the “**Bank**” or “**we**”). The protection of privacy and personal information is our first priority; therefore, this Privacy Policy for Institutional Clients (this “**Policy**”) is hereby formulated to help you fully understand how we collect, store, use, transfer, provide and protect the personal information that you provide, and the rights that you or the individuals concerned may have, when you use our products and services.

This Policy applies to the institutional clients (including but not limited to legal persons such as limited liability companies, joint stock companies and associations, and unincorporated organizations such as partnerships) who use the Bank’s products or services through online channels such as online banking and offline channels such as physical presence at the bank.

This Policy may be updated from time to time to reflect changes in our handling of personal information. In the case of any material changes to this Policy, the Bank will notify you by means of publication via email, official website (<https://www.bk.mufg.jp/global/globalnetwork/asiaoceania/shanghai.html>) or push notification on WeChat Official Account or otherwise as the Bank considers appropriate. Such updates and changes will take effect 30 calendar days from the date of notification to you or on any other date specified in such notification.

1. What Personal Information Will Be Handled by the Bank

We will only handle the personal information you provide about your contact person, agent, legal representative, senior management, authorized signatory, beneficial owner/actual controller, person in charge of transaction, and transaction-related party, etc. solely for the purposes stated in this Policy. The personal information that the Bank may handle includes the categories and types of personal information set out in the table below (in which any information that constitutes or may constitute **sensitive personal information** is **boldly underlined**). The categories and types of personal information set out below are not exhaustive and may be adjusted in accordance with our management and operational needs.

Category and Type	List of Information	Method of Acquisition
Personal Identification Information	Name, ID information (type, number, expiration date and copy of ID document, etc.) , date of birth, gender, ethnicity, nationality, country of residence, family members, address, phone number, and email address	Being provided by you, obtained from public sources, or automatically collected by information system
Personal Educational and Work Information	Occupation, title, name of employer, educational experience, and work experience	
Other information	Physical appearance , documentation of income , and public criminal record	

Please note that, as described in the preceding paragraph, the above **boldly underlined** information constitutes or may constitute sensitive personal information. If you refuse or request a restriction on the handling of certain sensitive personal information, the Bank may not be able to fulfill relevant stated purposes, thus affecting your rights and

interests. Please see the following table for the specific purposes and implications related to non-handling of sensitive personal information by the Bank (the table is not exhaustive and may be adjusted according to the Bank's management and operational needs).

Sensitive Personal Information	Effect of Non-handling
ID Information	Inability to open, change or close an account or apply for and receive banking service; inability to access bank offices, or inability to receive or give gifts, hospitality or other benefits.
Documentation of Income	Inability to apply for and receive banking service.
Physical Appearance	Inability to access bank office to apply for and receive banking service.

2. Why and How the Bank Will Handle Your Personal Information

When you are using the products or services provided by the Bank, the Bank will handle personal information for the purpose of, among others, conducting business and complying with various laws and regulations and internal policies and procedures. The Bank may handle personal information for the purposes and in the manners specified below:

Category	Description of Purpose
Conducting Banking Business	<ul style="list-style-type: none"> ➤ To review compliance document ➤ To manage the authenticity of transaction ➤ To manage online business system password and token ➤ To send and receive documents and items ➤ To follow up the conducting of business
Fulfilling Legal and Regulatory Compliance Obligations	<ul style="list-style-type: none"> ➤ To fulfill obligations regarding anti-money laundering and counter-terrorism financing, account management, and reporting information to regulatory authorities ➤ To fulfill security obligations through real-time monitoring devices according to regulatory requirements
Conducting Internal Compliance Management	<ul style="list-style-type: none"> ➤ To conduct internal and external audits ➤ To manage anti-bribery and corruption risks
Conducting Marketing Activities	<ul style="list-style-type: none"> ➤ To control office access ➤ To organize seminars and other activities ➤ To send market information

3. Legal Grounds for the Bank to Handle Personal Information

We will only handle the personal information you provide with due authorization and consent. However, please be fully aware that we may handle personal information without your or relevant individual's authorization or consent under the following circumstances:

- 1) as required to conclude and perform a contract to which relevant individual is a party;
- 2) as required to fulfill our statutory duties or legal obligations;
- 3) as required to respond to a public health emergency;

- 4) as required to protect your or any other person's life, health or property in an emergency;
- 5) within a reasonable scope prescribed by applicable laws and regulations in order to perform acts such as news reporting or public supervision for the public interest;
- 6) within a reasonable scope prescribed by applicable laws and regulations, where such personal information has been disclosed by the subject of such personal information himself/herself or has been otherwise lawfully disclosed; and
- 7) in other circumstances stipulated by applicable laws and administrative regulations

4. Information Security

In order to protect the security of personal information, we have taken security measures that comply with industrial standards. Furthermore, according to the materiality of the personal information that you provide and the method in which they are stored, the Bank will develop security procedures in accordance with applicable laws and regulations and carry out relevant operations accordingly. In addition, the Bank will take reasonable measures to prevent unauthorized access, destruction, use, modification or disclosure of the personal information you provide.

In the unfortunate event of a personal information security incident, we will, in accordance with the requirements of applicable laws and regulations, promptly inform you and/or relevant individuals of, among others, the basic situation of the security incident (the cause of the incident as well as the types of personal information that have been leaked, tampered with, or lost) and the harm that may have been caused, the remedial measures that we have taken or will take, the measures that can be taken on your own to prevent and mitigate the harm, and our contact information. We will promptly inform the situation related to the incident. Where it is impractical to inform the subjects of personal information one by one, we will make a public announcement in a reasonable and effective manner. We will also take the initiative to report on the handling of personal information security incidents as required by regulatory authorities.

5. Information Sharing

The Bank may share your personal information with other entities both within and outside the group of MUFG Bank (collectively the “**Third Party**”) in order to fulfill the purposes stated in this Policy. We will only share personal information on a necessary basis and subject to the purposes stated in this Policy. We will obtain authorization and consent from the individuals concerned as required by applicable laws and regulations or confirm that Third Parties are handling the personal information you provide in compliance with the relevant laws and regulations.

1) Provision to Third Parties

We will not share the personal information you provide with any company, organization or individual other than the Bank, except that:

- i) In order to provide financial services you need, we may provide necessary personal information relating to your transactions to other organizations that provide financial services (such as counterparty banks, payment system providers, and agent banks).
- ii) We will share the personal information you provide with relevant Third Parties, governmental authorities and/or industry regulators as required by laws, regulations or legal proceedings (such as court order or subpoena) or as mandated by governmental authorities.

- iii) For the purpose of business operation and management, we may share the personal information you provide with our affiliates in order for us to provide you with better services.
- iv) For the purpose of risk management and audit, etc., we may share the personal information you provide with service providers (such as accountants, auditors, lawyers and other external professional advisors, and logistics service providers) that we engage.
- v) We may share the personal information you provide with other Third Parties after obtaining express consent from the individuals concerned (whether by acting through your company or on our own).

2) Entrusted Handling

We engage various service providers and other Third Party organizations in order to provide you with better products and services. We may engage service providers and other Third Parties, such as accountants, auditors, lawyers and other external professional advisors, as well as various service providers (such as security companies, IT systems, and other Third Parties engaged to assist the Bank in carrying out its business activities), to handle the personal information you provide.

As required by applicable laws, the Third Parties are obligated to take reasonable measures to protect the confidentiality and security of the personal information you provide and to handle the personal information you provide solely for the purposes described in this Policy.

6. Cross-border Transfer

As the group of MUFG Bank is a multinational group of companies with operations around the world, the Bank may share the personal information you provide with other entities both within and outside of the group of MUFG Bank that are located outside of China (collectively referred to as “**Offshore Third Parties**”) in order to fulfill the purposes described in this Policy. We will fulfill the necessary obligations required for cross-border transfers in accordance with applicable laws and regulations and will make our best efforts to ensure the security in personal information transfer.

For a non-exhaustive list of Offshore Third Parties, please refer to the following List of Information Shared with Offshore Third Parties. The personal information you provide may not necessarily be shared with all Offshore Third Parties included in the list, depending on the applicability of the purposes of handling stated in this Policy. The list may be updated from time to time to reflect changes in the Offshore Third Parties, and the Bank will notify you of such updates and changes by means of publication via email, official website (<https://www.bk.mufg.jp/global/globalnetwork/asiaoceania/shanghai.html>) or push notification on WeChat Official Account or otherwise as the Bank considers appropriate.

In addition to the list, the Bank may also obtain your authorization or consent for the export of personal information by other means such as signing contract or confirming in writing/verbally in certain specific scenarios in accordance with applicable laws and regulations.

Types of Personal Information to Be Provided	Purpose of Handling	Method of Handling	Offshore Third Parties and Contacts
Your legal representative and contact person's: Name, title, phone number, and email address	To provide financial service	Access, storage, and deletion	MUFG Bank Ltd. and its branches and affiliates (Please refer to the official website of the Bank for contact address and phone number: https://www.bk.mufg.jp/global/globalnetwork/index.html)
Your legal representative, senior management, authorized signatory, beneficial owner/actual controller's: Name, ID information, date of birth, gender, ethnicity, nationality, family members, address, phone number, and email address, occupation, title, name of employer, work experience, and public criminal record; Your personnel who participates in gift and hospitality events's: Name, title and name of employer	To manage and control risks		

7. Rights Related to Personal Information Protection

In accordance with applicable laws and the Bank's rules and procedures, your personnel (such as your legal representative, contact person and agent, etc.; hereinafter collectively referred to as "**Your Personnel**") are entitled to the following rights with respect to their personal information. If any person from your company intends to exercise the following rights with respect to the personal information that are not his/her own, please ensure that he/she has obtained full authorization from the subject of such personal information, and we will verify the authorization if necessary.

- 1) Right to Access: Your Personnel have the right to access their personal information collected by the Bank;
- 2) Right to Correct: Your Personnel have the right to correct any of the personal information collected by the Bank if such information is incorrect, inaccurate or incomplete;
- 3) Right to Reproduce: Your Personnel have the right to obtain copies of their personal information collected by the Bank;
- 4) Right of Portability: Your Personnel have the right to request that their personal information collected by the Bank be transferred to another organization designated by Your Personnel, subject to the satisfaction of the conditions required by the cybersecurity authorities;
- 5) Right to Refuse and Restrict: Your Personnel have the right to refuse or restrict certain types of handling activities or the handling of certain types of personal information collected by the Bank;
- 6) Right to Delete: Your Personnel have the right to request the deletion of their personal information collected by the Bank under the following circumstances: (A) if the purpose for which the personal information is handled has been achieved or cannot be achieved or the personal information is no longer required to achieve such purpose; (B) if we cease to provide the relevant products or services, or the retention period of personal information has expired; (C) if Your Personnel has withdrawn his/her consent; (D) if we handle personal

information in violation of laws or administrative regulations or agreements; or (E) in other circumstances as provided for in laws and administrative regulations.

For the avoidance of doubt, even if a request for deletion is made by Your Personnel, such request may be denied in any of the following circumstances: (A) the Bank has other legal grounds for the handling of personal information; (B) the retention period has not yet expired; and (C) it is technically impossible or difficult to delete (in which case the Bank will stop handling activities other than storing and taking necessary security measures);

- 7) **Right to Withdraw:** Your Personnel have the right to withdraw any consent that they have given to the Bank for the handling of their personal information. When Your Personnel withdraw their authorization or change the scope of their consent, we will no longer handle the corresponding personal information; provided however that such withdrawal will not affect the handling of personal information that we previously conducted on the basis of such authorization or consent. For the avoidance of doubt, even if Your Personnel has withdrawn his or her consent, the Bank may still handle their personal information if the Bank has other legal grounds for handling their personal information (such as fulfillment of legal obligations); and
- 8) **Right to Request Explanation:** Your Personnel have the right to ask the Bank to explain the rules for handling their personal information (including the content of this Policy).

The Bank will make reasonable efforts to verify the accuracy of the personal information collected and retain complete, accurate and correct information.

If intending to exercise any of the above rights, you or Your Personnel may contact us via the contact details set forth at the end of this Policy. Ordinarily, your request will be responded to within 30 calendar days from the date when the Bank confirms the acceptance of your request. In principle, the Bank will not charge any fee for reasonable requests; provided however that, in accordance with applicable laws and regulations, the Bank has the right to charge directly-relevant necessary fees for repetitive requests that exceed reasonable limits. The Bank may reject requests that are unreasonably repetitive, or require excessive technical means, or pose a risk to the legal rights of others or are highly impractical.

8. Retention Period

The Bank will retain the personal information collected from you for a period necessary to fulfill the purposes described in this Policy. In addition, the Bank may retain the personal information you provide as required to comply with legal or regulatory obligations, respond to governmental requests, or resolve any disputes or complaints.

Upon the expiration of the retention period, the Bank will delete, or anonymize, or otherwise handle as permitted by laws and regulations, the personal information collected by the Bank from you.

9. Contact Us

If you intend to exercise any of the rights that you are entitled to or ask questions or make complaints about our handling of the personal information you provide, or if you have any questions about this Policy, please contact the Bank via the contact details set forth below:

- Please contact your Relationship Manager;
- Please refer to the Bank's official website for contact details:
<https://www.bk.mufg.jp/global/globalnetwork/asiaoceania/index.html>; or

- Please refer to our WeChat official public website for contact details: WeChat MUFG_China/About MUFG/MUFG (China)/Business Branch Network and Contact Information.

If you intend to exercise any of your rights against an Offshore Third Party, please contact them via the contact details set out in this Policy. If the Offshore Third Party does not respond to your request in a timely manner, please contact the Bank.

Date of Release: 28th September 2023