

CIBC China Candidate Privacy Policy

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We, CIBC World Market Advisory (Beijing) Co., Ltd, CIBC Beijing Representative Office and CIBC Shanghai Representative Office (collectively “**CIBC China**”), provide this CIBC China Candidate Privacy Policy (“**Policy**”) to you with respect to the collection, storage, use, disclosure, transfer and erasure (collectively “**processing**”, with variation of “**process**” or “**processed**”) of personal information in connection with your recruitment procedure for CIBC China.

With respect to the personal information about you processed in accordance with the Policy, we, CIBC China, shall be considered as the personal information handler under the *Law of the People’s Republic of China on the Protection of Personal Information* (“**PIPL**”), and we will protect your personal information in accordance with the PIPL and other applicable laws and regulations in China (excluding Hongkong, Macau and Taiwan).

The Policy applies to you if you are a candidate of CIBC China. Under this Policy, the word “candidate” covers, as appropriate and applicable, the individual who applies for the job vacancies which is directly hired by CIBC China or is hired by a third-party staffing agency but will be dispatched to work for CIBC China.

This Policy will help you understand the following:

- I. What is Personal Information or Sensitive Personal Information
- II. How We Collect and Use Your Personal Information
- III. How We May Entrust the Processing of, Share, Transfer and Publicly Disclose Your Personal Information
- IV. How We Store and Protect Your Personal Information
- V. Rights Candidates Have Regarding Personal Information
- VI. How this Policy Updated
- VII. How to Contact Us

Please read and fully understand this Policy, especially the clauses marked in bold. CIBC will collect and process personal information mainly on the basis of candidates’ “consent” as the legal basis. CIBC China will collect and process personal information on the basis of other legal basis as stipulated by laws and regulations when such legal basis is applicable, please refer to the section

“Exceptions to Consent” in this Policy for details.

I. What is Personal Information or Sensitive Personal Information

“Personal information” refers to all kinds of information related to identified or identifiable natural persons that electronically or otherwise recorded, excluding anonymized information.

“Sensitive personal information” refers to the personal information that is likely to result in damage to the personal dignity of any natural person or damage to his or her personal or property safety once leaked or illegally used, including biometric identification, religious belief, specific identity, medical health, and financial account and whereabouts.

II. How We Collect and Use Your Personal Information

We may process the following personal information about you (those marked **in bold and underlined** may be **sensitive personal information**). Please note that the following personal information is not collected on a one-time basis, but only when it is necessary to fulfill the specific purpose of processing.

Before Background Check Stage:

- **Resume Information:** Name, Contact Information, Academic and Work History

Background Check Stage:

- **Basic Information:** Name (Family Name, Given Name), Maiden Name (if applicable), Previous Name, Date of Birth, Gender, Nationality, Residential Addresses, Cell Phone Number, Current Email Address, Current A/H Phone Number
- **Identification Information:** **ID Number (including Foreign ID Card), Passport Number**
- **Education and Employment Information:**
 - Highest level of Education: School Name, Address, Subject & Grade, Types of Degree/Certificates, Student/Roll Number, Dates of Study
 - Professional Qualifications: Membership/Qualification, Date of Qualification, Full Name of Qualifying Body, Address, ID Number, Telephone Number
 - Employment History: Company Name and Address, Line Manager’s Name, Last Position, Employee ID Numbers, Date of Employment, Summary of Responsibilities, Reason for Leaving, Last Remuneration Package (including Basic salary, Allowances, Bonuses), Status
- **Other Information:** **Marital Status; Criminal Records; Bankruptcy; Fine;** Explanation for Break in Employment.

If a candidate provides us with personal information about a referrer or any other individual (“**Third-Party Individual**”) for purposes such as emergency contact, the candidate shall ensure that he or she has obtained the consent of the Third-Party Individual for the provision of his or her personal information to us and for the authorization of our use of his or her personal information. **If the Third-Party Individual does not consent to the provision of their personal information, please do not provide the Third-Party Individual’s personal information to CIBC China.**

We may process your personal information to the extent permitted or required under applicable law, for the following purposes:

- Communicate with you about the recruitment process, such as interview arrangement;
- Recruitment and/or employment decisions;
- Evaluation of candidates;
- Candidate identification;
- Compliance and risk management;
- Comply with legal and regulatory requirements;
- Prepare employment letter if the employment application is successful.

Of the personal information processed for the purposes listed above, **CIBC China will not process candidates’ sensitive personal information unless CIBC China have obtained separate consent to do so (except in cases where the consent of candidates is not required under applicable laws and regulations).**

CIBC China will strictly adhere to the principles of sufficient & necessity, minimum scope, and minimum impact when collecting and processing candidates’ sensitive personal information, and will take strict measures to protect candidates’ sensitive personal information as permitted by existing technological conditions. **Candidates shall understand that if the candidate does not consent to our processing of the candidates’ above-mentioned information which may be regarded as sensitive personal information, or withdraws his/her consent, CIBC China will not be able to (or will not be able to after the candidate has withdrawn his/her consent) carry out its normal recruitment procedure of the candidate, including but not limited to, managing interviews, making employment decision, evaluating candidates’ performance, etc., and the application for relevant vacancies may therefore be affected.** Candidates shall be aware that his/her decision to withdraw consent will not affect the personal information processing activities previously carried out on the basis of the candidate’s consent.

III. How We May Entrust the Processing of, Share, Transfer and Publicly Disclose Your Personal Information

A. Entrusted Processing

In the course of our recruitment procedure, we may entrust the processing of personal information to external service providers for recruitment related purposes.

For companies, organizations or individuals entrusted by us to process personal information, we will sign agreements with them, agreeing on the purpose of the entrusted processing, the duration, the processing method, the types of personal information, the protection measures, and the rights and obligations of both parties, and supervise their personal information processing activities.

B. Sharing

We may provide candidates' personal information in strict compliance with laws and regulations, the need for dispute resolution, or when required by administrative or judicial authorities in accordance with the law.

In the course of our recruitment, personal information of candidates will be kept confidential, but we may provide such information to:

- any agent, contractor, or third party service provider who provides administrative, telecommunications, computer or other services to CIBC China in connection with the employment of its employees or operation of its business;
- any other branch and subsidiary of CIBC group;
- any other person under a duty of confidentiality to CIBC China including a group company of CIBC which has undertaken to keep such information confidential;
- persons and companies seeking references;
- head office and regional office of CIBC; and
- any other affiliated company of the group to which CIBC China belongs.

We will not share a candidate's personal information unless it has obtained the candidate's separate consent to share the personal information in advance (except in cases where the candidate's consent is not required in accordance with applicable laws and regulations).

When we provide personal information of candidates to the abovementioned parties, it will follow the principle of sufficient necessity and provide them with only the minimum amount of personal information of candidates necessary to achieve the purpose. **Candidates shall understand that if they do not consent to the provision of their personal information by us to the relevant parties or withdraw their consent, we will not be able to (or will not be able to after they have withdrawn their consent) carry out our normal recruitment procedure of the candidates, including, but not limited to managing interviews, making employment decision, evaluating candidates' performance, and the application for relevant vacancies may therefore be affected.** Candidates shall be aware that his/her decision to withdraw consent will not affect the personal information processing activities previously carried out on the basis of the candidate's consent.

C. Transfer

We will transfer the personal information of candidates to other parties after obtaining the explicit consent of the candidates or at the request of the candidates in compliance with the conditions stipulated by the national cyber and information authorities.

If we need to transfer your personal information due to a merger, demerger, dissolution, declaration of bankruptcy, etc., we will inform you of the name or name and contact information of the recipient. We will also require the new company, organization or individual holding your personal information to continue to be bound by this Policy and to fulfill its obligations as a personal information handler; if the new company, organization, or individual holding your personal information changes the purposes or methods of processing described in this Policy, it will seek the candidate's consent again in accordance with the law.

D. Publicly Disclose

In principle, we will not publicly disclose your personal information. If public disclosure is necessary, **we will inform candidates of the purpose of the public disclosure, the type of information to be disclosed and the sensitive personal information that may be involved, and obtain your separate consent.**

E. Exceptions to Consent

In accordance with relevant laws and regulations, we do not need to obtain your consent to collect, use, share, transfer, or publicly disclose your personal information under the following circumstances:

- 1) where it is necessary for the conclusion or performance of a contract to which the individual concerned is a party;
- 2) where it is necessary for the performance of statutory duties or statutory obligations;
- 3) where it is necessary for the response to a public health emergency or for the protection of the life, health and property safety of a natural person in an emergency;
- 4) where such acts as news reporting and supervision by public opinions are carried out for the public interest, and the processing of personal information is within a reasonable scope;
- 5) where it is necessary to process the personal information disclosed by the individual concerned or other personal information that has been legally disclosed within a reasonable scope in accordance with the provisions of the *PIPL*;
- 6) Other circumstances prescribed by laws and administrative regulations.

IV. How We Store and Protect Your Personal Information

A. Storage of Information

We will retain your personal information only for the retention period necessary to fulfil the purposes of this Policy and permitted by laws and administrative regulations. When the retention period of personal information expires, we will destroy, delete, or anonymize the personal information. If the destruction, deletion or anonymization of workers' personal information is technically difficult to achieve, we will stop processing it except for storage and necessary security measures.

B. Security Protection Measures

We will comply with relevant laws and regulations, and take necessary measures to ensure the security of personal information, prevent personal information from unauthorized access, public disclosure, unauthorized use, unauthorized modification, damage or loss, and ensure that candidates' personal information is at a reasonable level of security.

We will establish supporting management systems, internal control mechanisms and processes to ensure that candidates' personal information is at a reasonable level of security, such as strict restrictions on information access operation permission, and regular safety education and training on personal information protection for candidates.

We will do the best to protect candidates' personal information, but please understand that no security measures can be infallible. If candidates believe that the personal information processed by us has been subjected to unauthorized access, public disclosure, use, modification, damage, or loss, please contact us through the "How to Contact Us" in this Policy.

V. Rights Candidates Have Regarding Personal Information

A. Rights of Candidates

In accordance with relevant Chinese laws, regulations, standards and our rules and regulations, we protect candidates' rights to their own personal information. Within the scope permitted by relevant laws and regulations, candidates can exercise the following rights:

1. Right to be Informed & Right to Decide

Candidates have the right to be informed of the types of personal information we hold and how we process their personal information. At the same time, candidates have the right to consent to, restrict or refuse our processing of candidates' personal information collected on the basis of the legality of consent. When a candidate's personal information is collected and processed based on other legal basis, we will do so based on the principles of necessity, minimum scope, and minimum impact.

2. Right to Access & Right to Copy

Candidates have the right to access personal information held by us and to obtain a copy of it; we will normally provide the relevant information to the candidate in electronic form if the candidate requests it. Please note that a reasonable fee may be charged by us for the processing of any data access request.

3. Right to Rectification & Right to Supplement

If a candidate believes that the personal information of him/her processed by us is incorrect, inaccurate, or incomplete, the candidate has the right to request us to correct, update or supplement it.

4. Right to Delete

A candidate may request us to delete the candidate's personal information in the following cases:

- 1) If the purposes for which we process the candidate's personal information have been fulfilled, cannot be fulfilled or are no longer necessary to fulfill the purposes for which it is processed;
- 2) If the period of retention of the personal information set out in this Policy or otherwise lawfully agreed with the candidate has expired;
- 3) If the candidate withdraws the consent granted to us to process the candidate's personal information. Except where the collection and processing of the candidate's personal information is based on another legal basis (please be aware that your decision to withdraw consent will not affect personal information processing activities that were previously carried out on the basis of consent);
- 4) If our processing of candidates' personal information violates the provisions of laws and administrative regulations, or violates this Policy or other lawful agreements with candidates;
- 5) In other cases stipulated by laws and administrative regulations.

Please be aware that if a candidate's request for deletion of the candidate's personal information conflicts with our retention period required by laws and regulations, or if deletion is not possible with our best endeavors in terms of existing technology, we will stop any other processing of the candidate's personal information other than storage (unless we are required by relevant laws and regulations to carry out a certain type of processing of the candidate's personal information), and we will take measures to protect the personal information of the candidate to the best of our ability.

If there are other circumstances in which a candidate believes that personal information needs to be deleted, the candidate should contact us using the contact information published in this Policy. Candidates are requested to understand that if the information they request to be deleted is necessary for the performance of an employment contract between us and the candidate, or for the provision of specific products or services to the candidate by us or a third party commissioned or hired by

us, the deletion of the information requested by the candidate may result in the contract not being fulfilled, or the candidate not being able to use the relevant products or services or perform his or her job duties properly.

5. Right to Withdraw Consent

Candidates have the right to withdraw the consent granted by the candidate to us to process the candidate's personal information at any time. Candidates are asked to understand that any day-to-day business and management activities require the processing of certain personal information, and that the withdrawal of consent by a candidate may result in the inability to carry out normal recruitment procedure, which will affect the result of your application. A candidate's decision to withdraw his or her consent will not affect the personal information processing activities that were previously carried out on the basis of the candidate's consent.

6. Right to Explanation

Candidates have the right to ask us to explain the rules for processing their personal information.

B. Channels for Candidates to Exercise Rights

Candidates may exercise the above rights in relation to personal information by contacting us through the contact details provided in the "How to contact us" .

As permitted by relevant laws and regulations, we may not be able to respond to all or part of a candidate's request in any of the following cases:

- 1) If the requested information is directly related to the fulfilment of our obligations under laws and regulations;
- 2) If the requested information is directly related to national security, national defense security;
- 3) If the requested information is directly related to public security, public health, or significant public interests;
- 4) If the information requested is directly related to criminal investigation, prosecution, trial and execution of judgements;
- 5) If the requested information is in conflict with an order of a judicial or law enforcement body or other competent authorities;
- 6) If we have sufficient evidence of subjective malice or abuse of rights by the candidate requesting the realization of his/her rights;
- 7) If responding to the candidate's request will result in serious damage to the legitimate rights and interests of the candidate or other individuals or organizations;
- 8) For the purpose of safeguarding the candidate's or other individual's life, property and other significant legitimate rights and interests, but it is difficult to obtain the candidate's consent;

- 9) If the requested information involves commercial secrets.

VI. How to Contact Us?

If you have any questions, comments or suggestions regarding this Policy, or wish to exercise your rights, you may contact us through the following ways. We will respond to you in a timely manner. E-mail [Application.APACHR@cibc.com]

- Telephone: 852 2841-6111
- Fax: 852 2841-6145

By continuing with this application, I expressly and voluntarily consent to the following:

- I have carefully read, fully understand and agree to all the provisions of the *CIBC China Candidate Privacy Policy* and consent to the processing of my personal information by CIBC China based on the scenarios and purposes described in the Policy.
- I expressly, specifically and voluntarily consent to *the collection and processing of my sensitive personal information* for the purpose and in the manner described in this Policy.
- I expressly, specifically and voluntarily consent to *the sharing of my personal information* for the purpose and in the manner described in this Policy.
- I expressly, specifically and voluntarily consent to *the cross-border collection of my personal information* by CIBC China for the purpose and in the manner described in this Policy.