



## CIBC China Client Privacy Policy

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Thank you for choosing Canadian Imperial Bank of Commerce (“**CIBC**” or “**We**”) for your **International Student Pay (“ISP”)** and **International Student Banking Offer (“ISBO”)** services. As the client of CIBC, you and your personal information are valued. CIBC will protect your personal information while serving you with qualified banking services based on the governance of the *Law of the People’s Republic of China on the Protection of Personal Information (“PIPL”)* and other laws and regulations in China and the management placed by CIBC.

We encourage you to read the *CIBC China Client Privacy Policy* before we process your personal information, which could help you better understand how we collect, store, use, process, transfer, share, disclose and delete your personal information. You also have your legitimate rights to reach us by referring the information in Article VIII.

Please understand that CIBC has to process your personal information partly based on your “Consent”. In order to ensure the conduct of relevant business, CIBC will keep a record of your “Consent” or “Separate Consent” under this Policy to support any future claims that you or CIBC may arise.

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 You Have Regarding Personal Information
- VI. How this Policy is Updated
- VII. How to Contact Us

**Please read and fully understand this Policy, especially the clauses marked in bold. As mentioned above, CIBC will collect and process personal information partly on the legal basis of your “Consent”. CIBC will collect and process personal information based on other legal bases 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, financial account and whereabouts, as well as the personal information of minors under the age of 14.**

## **II. How We Collect and Use Your Personal Information**

When we provide you with ISP and ISBO services, your personal information will be collected by CIBC for cross-border account opening, remittance and payment. The types of personal information that may be collected by CIBC are as follows (in which personal information 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:

### **When Providing CIBC ISP Services:**

#### **For Students:**

- **Basic Information:** Student ID; First Name; Last Name; Chinese Name;
- **Contact Information:** Email Address; Phone Number; Home Address (with Country, Province, City and Zip Code);
- **Property Information:** **Fee Invoice**; Payment Type; **Payment Amount**; Details of Fee;
- **Identity Information:** **Chinese National ID Card**;
- **Other Documents:** Letter of Acceptance

#### **For Payers:**

- **Basic Information:** Relationship to Student; First Name; Last Name;
- **Contact Information:** Email Address; Phone Number; Payer Address (with Country, Province, City and Zip Code);
- **Property Information:** Source of Funds; Phone Number linked to e-wallet;
- **Identify Information:** **Chinese National ID Card**;

### **When Providing ISBO Services:**

- **Payment Information:** Applied Program; Selected Payment Country; **Amount of Payment**

- **Student Details:** Title; First Name & Last Name on Passport, First Name & Last Name in Home Country Language (optional); School; Program of Study; Student ID (optional); Tentative Arrival Date and Graduation Date; Intended Use of Account; Occupation Category and Description; Detailed Description of Occupation; Whether the Account Benefit any Third Party; **Passport** or Admission Letter.
- **Student Contact Details:** Street Name and Number; Permanent Country/State/Province/City of Residence as per Passport; Registered Email Address; Password; Phone Number.

Please note that in some cases you need to provide personal information of any other third-party individual, you will be presumed to have obtain the consent of the third-party individual. Meanwhile, if your personal information is provided by any other third-party individual for purposes of using our services, consulting with CIBC or filling in CIBC's relevant questionnaire, etc., you will be presumed to have consented to the collecting of personal information by CIBC, but you still reserve your legitimate rights to arise under PIPL, which could also be referred in Article V. **Therefore, we recommend that you clearly communicate with a third-party individual to avoid personal information being provided to us that is not based on your own wishes.**

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

CIBC will strictly adhere to the principles of sufficient & necessity, minimum scope, and minimum impact when collecting and processing your sensitive personal information, and will take strict measures to protect your sensitive personal information as permitted by existing technological conditions. **You shall understand that if you do not consent to CIBC's processing of your above-mentioned information that may be sensitive personal information, or withdraws your consent, CIBC will not be able to (or will not be able to after you have withdrawn your consent) provide our normal ISP or ISBO services.** Your decision to withdraw your consent will not affect the personal information processing activities previously carried out on the basis of your 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 daily operation and management, CIBC may entrust the processing of personal information to external service providers. These providers may assist us with printing (e.g., statements, letters), information storage, cloud and web-hosting services, payment processing, marketing, advertising, contact center services, information technology (IT) services, and fraud prevention and detection, among other

services.

For companies, organizations or individuals entrusted by CIBC to process your personal information, CIBC 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**

CIBC may provide your 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 CIBC's business, CIBC may provide personal information to suppliers or partners for the purpose of providing qualified ISP and ISBO services, and the personal information provided is limited to that required for the performance of our products and services.

**Please be aware that CIBC will not provide your personal information to any third parties unless we have obtained your separate consent to share the personal information in advance (except in cases where your consent is not required in accordance with applicable laws and regulations).**

When CIBC provides your personal information to the abovementioned third parties, it will follow the principle of sufficient & necessity and provide your personal information with only the minimum amount of personal information which is necessary to achieve our business purpose. **Please be aware that if you do not consent to the provision of your personal information to the relevant third parties or withdraw your consent, CIBC will not be able to (or will not be able to after you have withdrawn your consent) successfully provide our normal ISP or ISBO services.** Your decision to withdraw your consent will not affect the personal information processing activities previously carried out on the basis of your consent.

## **C. Transfer**

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

If CIBC needs 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 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 should seek your consent again in accordance with relevant laws and regulations.

#### **D. Publicly Disclose**

In principle, CIBC will not publicly disclose your personal information. If public disclosure is necessary, we will inform you of the purpose of the public disclosure, the type of information to be disclosed and the sensitive 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 *Personal Information Protection Law*;
- 6) Other circumstances prescribed by laws and administrative regulations.

### **IV. How We Store and Protect Your Personal Information**

#### **A. Storage of Information**

CIBC 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, CIBC will destroy, delete, or anonymize the personal information. If the destruction, deletion or anonymization of workers' personal information is technically difficult to achieve, CIBC 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 your information, prevent your personal information from unauthorized access, public disclosure, unauthorized use, unauthorized modification, damage or loss, and ensure that your personal information is at a reasonable level of

security.

We will establish supporting management systems, internal control mechanisms and processes to ensure that your 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.

**CIBC will do the best to protect your personal information, but please understand that no security measures can be infallible. If you believe that your personal information processed by CIBC in China has been subjected to unauthorized access, publicly disclose, use, modification, damage, or loss, please contact us through Article VIII in this Policy.**

## **V. Rights You Have Regarding Personal Information**

### **A. Rights of Clients**

In accordance with relevant Chinese laws, regulations, standards and rules and regulations of CIBC, we protect your rights to your own personal information. Within the scope permitted by relevant laws and regulations, you can exercise the following rights:

#### **1. Right to be Informed & Right to Decide**

You have the right to be informed of the types of personal information CIBC holds and how CIBC processes your personal information. At the same time, you also have the right to consent to, restrict or refuse CIBC's processing of your personal information collected on the basis of the legality of consent. When your personal information is collected and processed based on other legal basis, CIBC will do so based on the principles of necessity, minimum scope, and minimum impact.

#### **2. Right to Access & Right to Copy**

You have the right to access personal information held by CIBC and to obtain a copy of your personal information.

#### **3. Right to Rectification & Right to Supplement**

If you believe that your personal information processed by CIBC is incorrect, inaccurate, or incomplete, you have the right to request CIBC to correct, update or supplement it.

#### **4. Right to Delete**

You may request CIBC to delete your personal information in the following cases:

- 1) If the purposes for which CIBC processes the 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 you has expired;

- 3) If you withdraw the consent granted to CIBC to process your personal information. Except where the collection and processing of the personal information is based on another legal basis (please be aware that your decision to withdraw your consent will not affect personal information processing activities that were previously carried out on the basis of your consent);
- 4) If the processing of your personal information violates the provisions of laws and administrative regulations, or violates this Policy or other lawful agreements with you;
- 5) In other cases stipulated by laws and administrative regulations.

Please be aware that if your request for deletion of the personal information conflicts with CIBC's 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 your personal information other than storage (unless the company is required by relevant laws and regulations to carry out a certain type of processing of your personal information), and CIBC will take measures to protect the personal information to the best of CIBC 's ability.

#### **5. Right to Withdraw Consent**

You have the right to withdraw the consent granted by yourselves to CIBC to process your personal information at any time. Please be aware that any daily business or financial products and services need the processing of certain personal information, and that the withdrawal of consent may result in the inability of providing our normal ISP or ISBO services. Your decision to withdraw your consent will not affect the personal information processing activities previously carried out on the basis of your consent.

#### **6. Right to Explanation**

You have the right to require CIBC to explain the rules for processing their personal information.

#### **B. Channels to Exercise Rights**

You 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, CIBC may not be able to respond to all or part of your request in any of the following cases:

- 1) If the requested information is directly related to the fulfilment of CIBC's 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 CIBC has sufficient evidence of subjective malice or abuse of your rights;
- 7) If responding to the request will result in serious damage to the legitimate rights and interests of other individuals or organizations;
- 8) For the purpose of safeguarding individual's life, property and other significant legitimate rights and interests, but it is difficult to obtain your consent;
- 9) If the requested information involves commercial secrets.

## **VI. How this Policy is Updated?**

CIBC may update this Policy from time to time due to business needs or legal, regulatory and supervisory requirements. You can find the revised version here: <https://www.cibc.com/en/privacy-security/regional-privacy-policies.html>. Unless you explicitly express your objection, the amended Policy will apply to you and your information as of the revision date on the document

## **VII. 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 [[Mailbox.DPO@CIBC.com](mailto:Mailbox.DPO@CIBC.com)]



## Consent to CIBC China Client Privacy Policy

By providing my personal information, I expressly and voluntarily consent to the following:

- I have carefully read, fully understand and agree to all the provisions of the *CIBC China Client Privacy Policy* and consent to the processing of my personal information by CIBC 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 for the purpose and in the manner described in this Policy.