



Phnom Penh Commercial Bank Plc

CUSTOMER PRIVACY

This Customer Privacy explains how **PHNOM PENH COMMERCIAL BANK PLC**, registered in Cambodia with the company registration no. **00015794** dated 20 May 2008, company number **+(855) 23 999 500**, and registered office address N. 217, Norodom Blvd (Street 41), Sangkat Tonle Basak, Khan Chamkar Mon, Phnom Penh (herein after referred to as “**PPC Bank** ” , “**Bank**”, “**we**” or “**us**”), collects, stores, uses and protects personal information.

By using website, products, services or any other features, technologies or functionalities offered by PPCBank on www.ppcbank.com.kh (“**Website**”) or through any other means, you therefore agree that you have read this Customer Privacy and accept the terms stated herein in full. If you subscribe to any products or services offered by or through the Bank, you must comply with this Customer Privacy.

This Customer Privacy supplements our **Terms & Conditions** for Banking Service/Products which may be found at www.ppcbank.com.kh and your use of the website, products or services offered by or through the Bank is therefore governed by both this Customer Privacy and the Terms & Conditions for Banking Service/Products.

This Customer Privacy explains how we handle information collected and received by us from you during the course of your use of the website, products or services offered by or through the Bank. It also governs the collection, use and disclosure of your information and Personal Data (as defined below). For the purposes of this Customer Privacy, (“**Personal Data**” or “**Data Subject**”) means any data about an individual and/or entity who can be identified from that data. **We therefore strongly recommend that you read this Customer Privacy carefully to understand our policies and practices with regard to the collection, usage and handling of your Personal Data.**

Failure to supply such data may result in the Bank being unable to establish, maintain or provide Facilities, Products and Services to data subjects.

1. COLLECTION OF INFORMATION AND PERSONAL DATA

When you use the website, products or services offered by or through the Bank, you may provide your Personal Data voluntarily, including but not limited to your name, residential address, email address, bank account information, or any other required information.

It is also the case that data are collected, directly or indirectly, by the Bank from data subjects transacting with or through the Bank in the ordinary course of the Bank’s business, including (without limitation) information received from third parties, the public domain, collected through use of the

websites, cookies and electronic banking services of PPCBank, and/or when data subjects write cheques or deposit money or effect transactions through cards. PPCBank is not obligated to collect any of your information, and may do so at its own discretion.

Your consent to the collection, use, or disclosure of your Personal Data may be implied or express. PPCBank may obtain your express consent to the collection, use, and disclose your Personal Data in any of the following ways:

- a) in writing;
- b) by electronic confirmation via the Internet; or
- c) through other methods, as long as a record of your consent is created by you, by us, or by a third party acting on our behalf.

The choice to provide PPCBank with your consent to the collection, use, and disclosure of your Personal Data and account information is always yours, however, your decision to withhold such consent may limit our ability to provide you with certain services or offers.

PPCBank may also collect Personal Data about you for other purposes from time-to-time, or as permitted or required by law. We will always identify any additional purpose prior to or at the time of collection.

2. PERSONAL DATA IN RELATION TO MATTERS

From time to time, it is necessary for data subjects to supply the Bank with Personal Data in connection with matters such as:

- a. the opening or operation of accounts;
- b. the establishment or maintenance of facilities;
- c. the establishment or operation or provision of products or services offered by or through the Bank (which include deposits, loan, card, e-banking, trade finance, fund transfer, cash management service products and services as well as products and services relating to these) (collectively called, “**Facilities, Products and Services**”);
- d. to establish, maintain, and manage our relationship with you so that we may provide you with services that have been requested or comply with your requests;
- e. to review the services that we provide to you so that we may understand your requirements for our services and so that we may work to improve our services;
- f. to customize your use of the website, products or service;
- g. to protect us against error, fraud, theft and loss;
- h. to enable us to comply with applicable law or regulatory process;

- i. for the purposes stated in this Customer Privacy; and/or
- j. any other reasonable purpose to which you consent.

3. PURPOSES OF USING PERSONAL DATA

Data relating to a Personal Data may be used for any one or more of the following purposes:-

- a. processing applications from the data subject (including assessing the merits and/or suitability of the data subject's application(s) for the establishment of Facilities, Products and Services;
- b. operating, maintaining and providing Facilities, Products and Services to the data subject, including to enable the Bank or any member of PPCBank to fulfill any contract for Facilities, Products and/or Services that a data subject has requested and/or to understand the overall picture of the relationship of a data subject with PPCBank by linking data in respect of all accounts such data subject is connected to;
- c. conducting credit checks on the data subject (whether in respect of an application for Facilities, Products and Services or during regular or special review which normally will take place once or more each year);
- d. creating and maintaining the Bank's credit scoring models;
- e. maintaining credit history of the data subject for present and future reference;
- f. assisting other financial institutions to conduct credit checks and collect debts;
- g. ensuring ongoing credit worthiness of the data subject;
- h. designing banking card, deposit, loan, e-banking, trade finance, fund transfer, cash management service products and services as well as products and services relating to these for data subject's use;
- i. marketing services, products and other subjects (please see further details in paragraph (6) below);
- j. determining the amount of indebtedness owed to or by data subjects;
- k. enforcement of data subjects' obligations, to the Bank or any other member of PPCBank, including but not limited to the collection of amounts outstanding from data subjects and those providing security for data subjects' obligations;
- l. meeting or complying with any obligations, requirements or arrangements for disclosing and using data that apply to the Bank or any other member of PPCBank or that it is expected to comply according to:-
 - i. any law or regulation binding on or applying to it within Cambodia existing currently and in the future;
 - ii. any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside Cambodia existing currently and in the future;

- iii. any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers that is assumed by or imposed on the Bank;
- m. meeting or complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within PPCBank and/or any other use of data and information in accordance with any group-wide programs for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
- n. enabling an actual or potential assignee of all or any part of the business and/or asset of the Bank or participant or sub-participant of the Bank's rights in respect of the data subject to evaluate the transaction intended to be the subject of the assignment, participation or sub- participation;
- o. in connection with any member of PPCBank defending or responding to any legal, governmental, or regulatory or quasi-governmental related matter, action or proceeding (including any prospective action or legal proceedings), including where it is in the legitimate interests of the Bank or any member of PPCBank to seek professional advice, for obtaining legal advice or for establishing, exercising or defending legal rights;
- p. managing, monitoring and assessing the performance of any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to the Bank in connection with the establishment, operation, maintenance or provision of Facilities, Products and Services; and/or
- q. any other purposes relating to the purposes listed above.

4. PERSONAL DATA IN RELATION TO A DATA SUBJECT

Personal Data the Bank holds relating to a data subject is kept confidential but the Bank may provide, transfer or disclose such data or information to any one or more of the following parties (whether within or outside Cambodia) for the purposes set out in paragraph (3):-

- a. any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to the Bank in connection with the establishment, operation, maintenance or provision of Facilities, Products and Services;
- b. any other person under a duty of confidentiality to the Bank including any other member of PPCBank which has undertaken to keep such information confidential;
- c. the drawee bank providing a copy of a paid cheque (which may contain information about the payee) to the drawer;
- d. any person or entity to whom the Bank or any other member of PPCBank is under an obligation

- or otherwise required to make disclosure under the requirements of any law or regulation binding on or applying to the Bank or any other member of PPCBank, or any disclosure under and for the purposes of any guidelines, guidance, directives, rules, codes, circulars or other similar documents issued or given by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers with which the Bank or any other member of PPCBank is expected to comply, or any disclosure pursuant to any contractual or other commitment of the Bank or any other member of PPCBank with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers, all of which may be within or outside Cambodia and may be existing currently and in the future;
- e. any financial institution and merchant acquiring company with which a data subject has or proposes to have dealings;
 - f. any actual or proposed assignee of all or any part of the business and/or asset of the Bank or participant or sub-participant or transferee of the Bank's rights in respect of the data subjects;
 - g. any party giving or proposing to give a guarantee or third party security to guarantee or secure the data subject's obligations; and/or
 - i. any member of PPCBank which may include a Head Office function acting as a data controller in respect of data subject's data;
 - ii. third party financial institutions, insurers, credit card companies, securities and investment services providers;
 - iii. third party reward, loyalty, co-branding and privileges program providers;
 - iv. co-branding partners of the Bank and/or any member of PPCBank (the names of such co-branding partners can be found in the application form(s) for the relevant services and products, as the case may be);
 - v. external service providers (including but not limited to mailing houses, telecommunication companies, telemarketing and direct sales agents, call centers, data processing companies and information technology companies) that the Bank engages for the purposes set out in paragraph (3) (i) above.

5. PERSONAL DATA IN RELATION TO MORTGAGES

With respect to data in connection with mortgages applied by a data subject (in any capacity), the following data relating to the data subject (including any updated data of any of the following data from time to time) may be provided by the Bank, on its own behalf to a credit reference agency:-

- a. full name;
- b. capacity in respect of each mortgage (as borrower, mortgagor or guarantor, and whether in the data subject's sole name or in joint names with others);
- c. Cambodia Identity Card Number or travel document number;
- d. date of birth;
- e. correspondence address;
- f. mortgage information in respect of each mortgage;
- g. type of the facility in respect of each mortgage;
- h. mortgage status in respect of each mortgage (e.g., active, closed, write-off (other than due to a bankruptcy order), write-off due to a bankruptcy order); and
- i. if any, mortgage closed date in respect of each mortgage.

6. PERSONAL DATA IN RELATION TO DIRECT MARKETING

The Bank intends to use a data subject's data in direct marketing and the Bank requires the data subject's consent (which includes an indication of no objection) for that purpose. In this connection, please note that:

- a. the name, contact details, products and services portfolio information, transaction pattern and behavior, financial background and demographic data of a data subject held by the Bank from time to time may be used by the Bank in direct marketing;
- b. the following classes of services, products and subjects may be marketed:-
 - i. include deposits, loan, card, e-banking, trade finance, fund transfer, cash management service products and services;
 - ii. reward, loyalty or privileges programs and related services and products;
 - iii. services and products offered by the Bank's co-branding partners (the names of such co-branding partners can be found in the application form(s) for the relevant services and products, as the case may be); and
 - iv. donations and contributions for charitable and/or non-profit making purposes;
- c. the above services, products and subjects may be provided or (in the case of donations and contributions) solicited by the Bank and/or:-
 - i. any member of PPCBank;
 - ii. third party financial institutions, insurers, credit card companies, securities and investment services providers;

- iii. third party reward, loyalty, co-branding or privileges programs providers;
 - iv. co-branding partners of the Bank and/or any member of PPCBank; and
 - v. charitable or non-profit making organizations;
- d. in addition to marketing the above services, products and subjects itself, the Bank also intends to provide the data described in paragraph (6);
- e. above to all or any of the persons described in paragraph (6)(c) above for use by them in marketing those services, products and subjects, and the Bank requires the data subject's consent (which includes an indication of no objection) for that purpose;

If a data subject does not wish the Bank to use or provide to other persons his/her data for use in direct marketing as described above, the data subject may exercise his/her opt-out right by notifying the Bank.

7. USE OF COOKIES

PPCBank or its partners may place small data files (cookies) or pixel tags on your computer or other device when you access the Website. PPCBank may use these technologies to recognize you as a returning user, customize its services, content and advertising, evaluate marketing activities, and collect information about your computer or other access device. PPCBank may use various cookies, including but not limited to session cookies, persistent cookies, and "flash cookies." PPCBank may codify its cookies to limit access of third parties to the received information. You can independently control the use of cookies from your browser or browser add-ons; however, blocking or disabling PPCBank's cookies may interfere with your use of the Website. PPCBank is not obligated to place cookies on your computer or device, and may do so at its own discretion.

8. USE OF LOG FILES

PPCBank may use the log files to collect your IP addresses, type of browser, Internet Service Provider, date/time stamp, referring/exit pages, and number of clicks to analyze your activity on the Website, collect geographic and demographic information, and evaluate content of the Website. The information collected from log files is not personally identifiable. PPCBank is not obligated to use log files, and may do so at its own discretion.

9. STORING, USING, AND SHARING YOUR PERSONAL DATA

PPCBank may store or process your Personal Data and account information in its database located within or outside your place of residence. PPCBank may engage third parties to store such Personal Data. PPCBank does not sell or rent your Personal Data to third parties for their marketing purposes

without your explicit consent. PPCBank may use your Personal Data to customize your use of the Website and our services; analyze your activity on the Website, including through third parties such as Google Analytics and alike; evaluate and improve its marketing efforts and for other reasons relevant to your use of the Website and our services.

By using the website, products or services offered by or through the Bank, you authorize PPCBank to use your information and Personal Data in Cambodia and/or other countries where we operate for the purposes mentioned above. PPCBank will ensure that your information is transferred in accordance with this Customer Privacy and protected in accordance with applicable laws related to personal data protection.

10. SEVERABILITY

In the event any provision of this Customer Privacy is found to be invalid, illegal, or unenforceable, the remaining provisions of this Customer Privacy shall nevertheless be binding you with the same effect as though the void and unenforceable part had been severed and deleted.

11. SECURITY

You acknowledge and agree that it is important that you protect against unauthorized access of your account and information by choosing your password carefully and keeping your password and account secure.

12. UPDATES AND CHANGES TO THE CUSTOMER PRIVACY

PPCBank reserves the right to modify this Customer Privacy, with/without notice, at any time. If this Customer Privacy is modified in any way, it will be updated at www.ppcbank.com.kh. The updated version becomes effective at the time of posting. It is your responsibility to check updates regularly. Regular checking and reviewing this page ensures that you are updated on the information which may be collected, used (and under what circumstances), and if it may be shared with other parties (if at all). You understand that your continued use of the Website after this Customer Privacy has been modified constitutes your acceptance of the Customer Privacy as amended.

13. Contact Us

If you have any questions about this Customer Privacy or wish to access or correct your Personal Data held by PPCBank, please contact us at enquiry@ppcb.com.kh

Should you have any query, request or feedback relating to your Personal Data, please contact us at:

Phnom Penh Commercial Bank Plc

HEAD OFFICE

N. 217, Norodom Blvd (Street 217), Sangkat Tonle Basak, Khan Chamkar Mon,
Phnom Penh.

Tel: (855) 23 999 500, **Fax:** (855) 23 999 540

Website: www.ppcbank.com.kh

Hotline: (855) 23 909 909