# Privacy Notice – How we use personal information

Effective from April 2026

Shanghai Pudong Development Bank Co., Ltd., London Branch ("we", "us", "our") is the data controller responsible for your personal information.

The following sections explain how and for what purposes we use your personal information.

## Using your personal Information

We may hold personal, financial and other information about you and may obtain or receive such information about you in the future. The information we process about you may be obtained from various sources, including:

- directly from you;
- from your dealings with any member of the Group, including from the transactions and operation of your accounts and services; and
- from other organisations including credit reference agencies and fraud prevention agencies.

We may link information concerning your accounts with us to information relating to products and services we provide to you.

Such information may also include special category or sensitive personal data, such as information relating to your health, criminal convictions or proceedings. We will only process such data where necessary and where permitted under applicable law, including where required to comply with legal or regulatory obligations, for the pursuit or defence of legal claims, or where you have provided explicit consent.

## Legal basis for processing

We process your personal information in accordance with applicable data protection law on the following legal bases:

- the performance of a contract with you or to take steps at your request prior to entering into a contract;
- compliance with legal and regulatory obligations;
- our legitimate interests (such as fraud prevention, risk management, business administration and improving our services), provided these are not overridden by your rights; and
- where applicable, your consent (which you may withdraw at any time).

## Uses of your information

We will use your information:

- to make credit decisions about you and anyone to whom you are financially linked (which may include credit scoring);
- to manage credit and credit-related facilities;
- to consider and implement business, product and technology developments;
- to undertake statistical analysis, financial risk assessment, anti-money laundering checks (which may include contacting you), compliance and regulatory reporting, fraud prevention and recovering debt;
- to help us identify products and services which may be of interest to you (unless you have asked us not to do so); and
- for systems testing, maintenance and development.

## Confidentiality

We will disclose information outside Shanghai Pudong Development Bank Co., Ltd, London Branch only:

- where compelled or permitted by law;
- where appropriate, where you have provided your consent (which is not necessarily be in writing);
- where we have a public duty to disclose the information;
- to our agents or subcontractors for operational reasons;

- to persons, including insurers, who provide a service or benefits to you or to us in connection with your account(s);
- to licensed credit reference agencies and fraud prevention agencies;
- where necessary to comply with the requirements, codes or recommendations of our regulators;
- to confirm your identity for anti-money laundering purposes, which may include checking the electoral register;
- to any person to whom we transfer or may transfer our rights or obligations; and
- to any subsidiary within the Group, for the purpose of managing your transactions and operating your accounts and services.

### Fraud prevention agencies

We may disclose your information to licensed credit reference agencies and fraud prevention agencies to help make financial decisions about you. This may occur during the application process and on an ongoing basis to determine whether to continue to provide products or services to you or to adjust any level of credit for you and anyone with whom you are financially linked.

Our enquiries or searches may be recorded, and credit reference agencies may supply us with financial information. If you make several credit applications within a short period, this may temporarily affect your ability to obtain credit.

### Credit reference agencies

We may also disclose information to licensed credit reference agencies about how you conduct your account(s), and this information may be shared with other financial institutions to help make financial decisions about you and anyone with whom you are financially linked.

If you borrow and do not repay in full and on time, we may notify credit reference agencies, which will record the outstanding debt.

If false or inaccurate information is provided by you or on your behalf, or if we suspect or identify fraud, details may be recorded and passed to fraud prevention agencies, law enforcement agencies and other organisations involved in crime and fraud prevention. These organisations may access and use this information.

We and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- checking details on applications for credit and credit related or other facilities;
- managing credit and credit related accounts or facilities;
- recovering debt;
- checking details on proposals and claims for all types of insurance; or
- checking details of job applicants and employees.

### Provision of services, transfer of information and regulators

From time to time, we will engage service providers, agents and subcontractors to provide services. They may have access to, and process, your information on our behalf.

In such cases, we will ensure that appropriate safeguards are in place, such as the use of standard contractual clause or other legally recognised safeguards, and that your information is processed in accordance with the applicable protection legislation and under strict obligations of confidentiality. You may request further information about these safeguards by contacting us.

We may also be required to share information about you with our regulatory authorities.

### Sharing Information about You with tax authorities

If we believe that you may be required to report your income or are otherwise subject to tax in another country, we may share information about your accounts with HM Revenue & Customs or relevant foreign tax authorities. These authorities may in turn exchange this information with other tax authorities.

Where necessary, we may request information or documents from you to comply with these obligations. You must provide such information within 30 days. If you fail to do so, we may close your account or take other action as required by law, including withholding funds and reporting to the relevant authorities.

### Marketing

We may contact you by post, telephone, email, SMS text or other reasonable means to inform you about products and services provided by us that we believe may be of interest to you.

You have the right to opt out of receiving marketing communication at any time.

We may record and/or monitor telephone calls for security purposes, to help address complaints, improve customer service and for staff training.

### Sale or Transfer

If we or any other company in our Group sells or transfers all or part of its business or assets, or enters into a merger or restructuring, we may disclose your personal data and confidential information to potential buyers, transferees or merger partners and their advisers.
We will ensure that your information is protected under appropriate confidentiality obligations. Following completion of any such transaction, the recipient may continue to use your information in accordance with this privacy notice.

### Changes to your information

We require the personal information we hold about you to be accurate and up to date. Please inform us promptly of any changes to your personal details so that our records can be updated accordingly.

### Retention of your information

We will retain your personal information only for as long as necessary to fulfil the purposes for which it was collected, including to satisfy legal, regulatory, tax, accounting and reporting requirements. Retention periods are determined based on the nature of the information and applicable legal obligations.

### Your rights

You have rights under data protection law in relation to your personal information, including the right to:

- request access to your personal data;
- request correction of inaccurate or incomplete data;
- request erasure of your data in certain circumstances;
- request restriction of processing;
- object to processing, including for direct marketing;
- withdraw consent at any time where processing is based on consent; and
- request transfer of your data, where applicable.

You also have the right to lodge a complaint with the the Information Commissioner's Office (ICO): Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or visit www.ico.gov.uk.

### Further information

If you would like details of the agencies from which we obtain and record information about you, or if you have any questions about this notice, please write to: Shanghai Pudong Development Bank Co. Ltd., London Branch, Legal and Compliance, 19th Floor, 1 Angel Court, London Ec2R 7HJ.