

## Privacy Policy Statement

### Our Policy

The Hong Kong Institute of Bankers (“HKIB”) is committed to upholding the highest standards of personal data protection. We ensure that all staff strictly comply with the Data Protection Principles and all applicable requirements under the Personal Data (Privacy) Ordinance (“the Ordinance”). For the purposes of this Privacy Policy Statement, the term “*personal data*” shall carry the meaning ascribed to it under the Ordinance.

HKIB collects, uses, and processes personal data from a broad range of Individuals which including but not limited to current and former members, non-members, participants, candidates, job applicants, and professional service providers such as trainers, examiners, moderators, writers, and reviewers, solely for legitimate administrative, operational, and communication purposes necessary for delivering our services.

HKIB is firmly committed to safeguarding Individuals’ privacy rights and handling personal data responsibly and transparently. This Privacy Policy Statement outlines HKIB’s data protection practices and the obligations that Individuals should be aware of when providing their personal data to us. All Individuals are strongly encouraged to review this Statement carefully to understand how their data may be collected, used, stored, disclosed, and protected, as well as their rights and responsibilities under the Ordinance.

### For what purpose do we collect your personal data?

HKIB collects personal data from Individuals by lawful and fair means for a range of legitimate, clearly defined, and operationally necessary purposes. Such purposes are directly related to the delivery, administration, enhancement, and governance of the Institute’s services, programmes, and activities. These include, but are not limited to, the following:

- **Managing memberships** – such as processing applications, renewals, and updates.
- **Running training and development programmes** – including course enrolment, learning support, and attendance records.
- **Organising examinations and certifications** – for registration, assessment, result processing, and qualification awards.
- **Handling applications for exemptions, grandfathering, and related arrangements.**
- **Recruiting staff and engaging service providers** – such as trainers, examiners, writers, and reviewers.
- **Coordinating events and activities** – including seminars, conferences, and industry functions.

- **Communicating with you** – to provide service updates, respond to enquiries, and send important notices.
- **Improving our services** – by carrying out research, surveys, and general analysis.
- **Meeting legal, regulatory, and administrative requirements.**

HKIB only uses personal data for these legitimate purposes and always handles such data HKIB collects only the data necessary for these purposes and ensures that all personal data is processed lawfully, fairly, and transparently, in accordance with the Personal Data (Privacy) Ordinance and HKIB's internal governance standards.

## What we collect?

HKIB obtains personal data either directly from Individuals or indirectly through authorised external sources. These external sources may include employers, training or service providers, partner organisations, and other third parties involved in the activities in which Individuals participate. In some cases, relevant information may also be provided by members of the public where appropriate. All data is collected only when it is necessary to support HKIB's operations and the delivery of our services.

The types of personal data we may collect include, but are not limited to:

- **Personal particulars** such as name, identification information, contact details, and demographic information.
- **Employment-related information**, including job titles, job responsibilities, professional roles, and employment history.
- **Educational background**, such as academic records, and qualifications obtained.
- **Professional qualifications and credentials**, including membership statuses, certifications, and licensing details.
- **Training and examination records**, training records, assessment results, and participation in HKIB learning activities.
- **Other relevant information** required for processing applications, delivering services, administering events, ensuring regulatory compliance, or fulfilling any purpose directly related to HKIB's functions.

HKIB collects only the information necessary for legitimate operational needs and ensures that all personal data is handled with care, transparency, and in accordance with the Personal Data (Privacy) Ordinance.

## How the collected personal data will be used

HKIB is committed to processing all personal data **fairly, confidentially, and lawfully** in accordance with the Personal Data (Privacy) Ordinance. Personal data collected by HKIB will be used only for purposes directly related to the functions and activities of the Institute. As part of routine operations, HKIB may compare, verify, transfer, or consolidate the personal

data provided with other information already held or subsequently obtained by HKIB, strictly for the purposes for which the data was collected or for purposes directly related to those activities.

In particular, personal data may be used for the following purposes:

- **Identity verification** to confirm Individuals' identities for registration, examination, membership, or service access.
- **Processing service requests** including applications, enrolments, registrations, renewals, or other service-related submissions.
- **Employment and service provider verification**, including checking employment history, professional references, and qualifications where relevant.
- **Service administration and delivery**, such as issuing notifications, managing logistics, and providing updates relevant to the service or activity.
- **Examination and assessment administration**, including processing of marks, results, records of attempts, and related communications.
- **Handling enquiries, feedback, and complaints**, and managing any reported cases of irregularities.
- **Record management**, including maintaining accurate membership profiles, service histories, participation records, and administrative documentation.
- **Research, surveys, and statistical analysis** conducted by HKIB to enhance service quality, evaluate programme performance, or support strategic planning.
- **Information sharing with authorised third parties**, including organisations that HKIB administers or conducts services on behalf of, or external partners engaged to provide services for HKIB under confidentiality obligations.
- **Providing HKIB member services**, including updates, benefits, and information relevant to Individuals' engagement with HKIB, subject to applicable consent requirements.
- **Compliance with legal, regulatory, or industry requirements**, or fulfilling obligations imposed by government bodies, regulators, or law-enforcement authorities.
- **Any other purposes expressly agreed to** between the Individual and HKIB.

### Use of AI and Automated Technologies

In alignment with Hong Kong's AI governance recommendations which including the PCPD's *Artificial Intelligence: Model Personal Data Protection Framework* and government guidance on generative AI technologies, HKIB may use Artificial Intelligence ("AI") technologies and automated tools to support administrative processes, analysis, and service enhancement.

Where AI tools are used in ways that involve personal data:

- AI tools operate under **human oversight** and do not replace human judgment.
- Personal data input into AI systems is strictly controlled, minimised, and safeguarded in accordance with PCPD guidelines.
- AI outputs that may influence decisions are subject to review by authorised personnel.

HKIB ensures that all AI use complies with the Ordinance and recognised AI governance principles including fairness, transparency, accountability, reliability, and ethical use.

### **Recorded communications**

Communications between Individuals and HKIB whether via online platforms, chatbots, email, SMS, telephone, or other channels may be recorded and retained for training, verification, service quality monitoring, and record-keeping. Where legally required, individuals will be informed prior to recording.

### **To whom we may disclose your personal data**

The personal data provided may be disclosed to third parties who help us provide services or support to you or who act for us. When personal data is provided to a third party, the personal data will only be HKIB may disclose personal data to third parties when such disclosure is necessary for delivering services, supporting operational needs, or fulfilling obligations directly related to the purposes for which the data was collected. These third parties may include organisations that assist HKIB in providing services, performing administrative functions, or acting on HKIB's behalf.

Personal data will only be transferred to third parties who are **bound by strict confidentiality obligations**, who demonstrate a commitment to protecting personal data, and who agree to use such information solely for the purposes specified by HKIB. HKIB exercises due care in selecting and monitoring these third parties to ensure their ongoing compliance with the Personal Data (Privacy) Ordinance and HKIB's internal data protection requirements.

Where required or permitted by law, HKIB may also disclose personal data to **law enforcement agencies, tax authorities, regulatory bodies, government departments, judicial authorities**, or other organisations in Hong Kong or overseas. Such disclosures will be made only when necessary to meet statutory or regulatory obligations, respond to legal processes, or support investigations and enforcement actions.

From time to time, it may be necessary for HKIB to **transfer personal data outside the Hong Kong SAR** in order to carry out the services requested by Individuals or to facilitate activities directly related to the original purpose of collection. In such cases, HKIB will ensure that **appropriate safeguards and security measures** are in place to protect the personal data during cross-border transfer where applicable and practicable. Individuals will also be informed in advance when such arrangements are required.

### **Direct marketing**

HKIB may use an Individual's personal data, in accordance with the requirements of the Personal Data (Privacy) Ordinance, to provide information about HKIB's products, services, programmes, events, and member benefits that may be of interest or relevance. Such

communications may also include updates or materials from HKIB's affiliated or related partners, where appropriate and permitted by law.

HKIB will **not** disclose or transfer your personal data to any third parties for their own direct marketing purposes **without first obtaining your explicit and informed consent**.

Individuals have full discretion over whether they wish to receive such optional communications. If you choose **not** to receive marketing message which including HKIB e-newsletters, promotional updates, or information about external industry events supported by HKIB, you may opt out at any time by contacting us at [cs@hkib.org](mailto:cs@hkib.org). You may also indicate your preference during your annual membership renewal process.

HKIB will honour all opt-out requests and ensure that your marketing preferences are updated promptly and accurately.

## Data retention

Unless otherwise agreed, any hard-copy documents containing personal data that Individuals provide to HKIB become the property of the Institute upon receipt. HKIB will handle, store, and ultimately dispose of such documents in accordance with its internal data retention policies and all applicable legal and regulatory requirements. All destruction processes are conducted securely to prevent unauthorised access, use, or disclosure.

Personal data will be retained **only for as long as necessary** to fulfil the purposes for which it was collected, or for purposes directly related to those activities. Where specific retention periods are required by law, regulation, or professional standards, HKIB will comply with such requirements.

In certain circumstances, HKIB may retain personal data for a longer duration when there is a **legitimate need** to do so, including but not limited to:

- Addressing or resolving potential disputes or claims;
- Complying with statutory obligations, audit requirements, or reporting duties;
- Maintaining records necessary for operational, compliance, or risk-management purposes.

HKIB regularly reviews its retention practices to ensure that personal data is **not kept longer than necessary**, and that data no longer required is securely destroyed or anonymised in a manner that prevents identification of the Individual.

## Data security

HKIB recognises that much of the personal data it handles is sensitive and confidential in nature. To safeguard this information, HKIB implements a **high standard of security controls** designed to prevent unauthorised access, loss, misuse, alteration, or disclosure. These measures apply to all forms of data whether maintained as hard-copy documents or stored in digital or electronic systems.

HKIB adopts appropriate administrative, technical, and physical safeguards, which include, where applicable:

- Access controls and permission-based data handling;
- Secure storage and encryption technologies;
- Monitoring and audit mechanisms to identify irregularities;
- Regular reviews of security protocols and staff training to ensure ongoing compliance with data protection requirements.

HKIB is committed to continuously enhancing its security measures to align with industry best practices and evolving regulatory expectations.

## Cookies on websites

Our websites use **cookies**, which are small data files stored in your browser when you access or interact with our online platforms. Cookies help HKIB enhance website performance and improve user experience by enabling functions such as:

- Analysing website traffic and visitor numbers;
- Understanding general usage patterns and user behaviour;
- Supporting website functionality and navigation.

By using HKIB's website, you acknowledge that cookies may be placed on your device automatically. You may adjust your browser settings to refuse cookies; however, certain website features may not function properly as a result.

## Accessing or correcting your personal data

Individuals are responsible for ensuring that the personal data they have provided to HKIB remains accurate and up to date. If there are any changes to your personal information after you begin using HKIB's services, you should notify HKIB as soon as possible.

Under the Personal Data (Privacy) Ordinance, Individuals have the right to:

- **Request access** to the personal data HKIB holds about them;
- **Request correction** of such data if it is inaccurate, incomplete, or outdated.

HKIB reserves the right to charge a **reasonable administrative fee** for processing data-access requests, in accordance with the Ordinance.

All requests for access or correction must be submitted **in writing** to HKIB at **cs@hkib.org**.

### **With whom you can enquire about our policies and practice**

Individuals may contact HKIB for enquiries regarding this Privacy Policy Statement, data handling practices, or related matters through any of the following channels:

- **Hotline:** (852) 2153 7800
- **Email:** cs@hkib.org
- **By Post:**  
The Hong Kong Institute of Bankers  
3/F, Guangdong Investment Tower  
148 Connaught Road Central  
Sheung Wan, Hong Kong

HKIB will respond to enquiries in a timely and professional manner.

### **Amendments**

Individuals may contact HKIB for enquiries regarding this Privacy Policy Statement, data handling practices, or related matters through any of the following channels:

- **Hotline:** (852) 2153 7800
- **Email:** cs@hkib.org
- **By Post:**  
The Hong Kong Institute of Bankers  
3/F, Guangdong Investment Tower  
148 Connaught Road Central  
Sheung Wan, Hong Kong

HKIB will respond to enquiries in a timely and professional manner.