



Personal Data Policy Statement - Philippines  
Data Protection Policy  
(For Corporate, Institutional and Individual Customers)

## 1. Introduction

The objective of this Data Protection Policy (“Policy”) is to provide you with information with respect to how CLSA Philippines, Inc. (“CLSA”) (as well as its representatives, Affiliates and/or agents) collects and processes personal information and sensitive personal information in accordance with applicable laws and regulations on data privacy, including the Data Privacy Act of 2012 of the Philippines and its implementing rules and regulations (“*DPA*”). “Affiliates of CLSA” shall mean any legal entities at any time directly or indirectly controlling, controlled by or under common control with CLSA, including but not limited to CITIC Securities International Company Limited and CITIC Securities Co. Ltd. References in this Policy to “we”, “us” and “our” mean CLSA and, where the context requires, will also include any company in the CLSA Group, or persons connected with the CLSA Group. For this purpose, “CLSA Group” shall mean CLSA together with all Affiliates of CLSA.

We ask that you read this Policy carefully as it contains important information regarding the collection, use and disclosure of Personal Data (as defined below).

In addition, this Policy is intended to provide you with sufficient information to enable you to notify and obtain consent from any natural person (a “Relevant Person”) whose Personal Data may have been provided or may be provided by you or your agent to us from time to time. As used in this Policy, a “data subject” refers to a natural person whose personal, sensitive personal, or privileged information is processed.

This Policy supplements but does not supersede or replace any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which we may have at law to collect, use or disclose your Personal Data.

## 2. Personal Data

In this Policy, “Personal Data” refers to any data about you or a Relevant Person, whether true or not, which would identify you or such natural person (as the case may be), or from which such identity can be reasonably and directly ascertained when put together with other information.

Examples of such Personal Data you may provide us include your name, license details, passport or other identification number, telephone number(s), age, marital status, mailing address, email address and any other information relating to you or any Relevant Person which you have provided or will provide to us in any forms you may have submitted to us, or via any other form of interaction with you.

## 3. Purposes for the Collection, Use and Disclosure of Personal Data

Generally, we collect, use, disclose and/or process Personal Data for the following purposes:

- a) processing applications for account opening, account closing, account maintenance and operations relating to your account(s);
- b) processing your applications or requests for services and/or products;
- c) providing broker-dealer services and/or products to you, including the services and products of external providers;

- d) managing your relationship with us and/or administration of your account with us including (where you act as agent for another party) those of your underlying principals;
- e) carrying out your instructions or responding to your enquiries or feedback;
- f) conducting identity and/or credit checks, and carrying out customer due diligence and other checks and screenings and ongoing monitoring that may be required under RA 9160 (Anti-Money Laundering Act of 2001), US Foreign Account Tax Compliance Act (FATCA) or any applicable law, regulation or directive or internal policies and procedures of CLSA or its Affiliates (including but not limited to those designed to combat bribery and corrupt practices, money laundering, terrorist financing and financial crime);
- g) preventing, detecting and investigating fraud, misconduct or any unlawful activities, whether or not requested by any relevant governmental or regulatory authority, and analysing and managing commercial risks;
- h) complying with all applicable laws, regulations, rules, directives, orders, instructions and requests from any governmental, tax, law enforcement or other authorities (whether local or foreign);
- i) managing our infrastructure, business operations and employees, and complying with our policies and procedures that may be required by applicable laws and regulations including those relating to risk control, compliance, security, audit, finance and accounting, human resources, systems and business continuity;
- j) addressing or investigating any complaints, claims or disputes;
- k) developing new services and/or products and updating you on our products and services from time to time;
- l) unless you have indicated your preference to opt out, providing you with marketing, advertising and promotional information, materials and/or documents relating to banking, investment, credit and/or financial products and/or services that we may be selling, marketing, offering or promoting, whether such products or services exist now or are created in the future;
- m) carrying out research, planning and statistical analysis;
- n) organizing promotional events; and
- o) enforcing our legal and/or contractual rights against you including, but not limited to, recovering any and all amounts owed to us,

(collectively, the “*Purposes*”)

#### **4. Consent**

By interacting with us and submitting information to us, or signing up for any products or services offered by us, you represent and agree that:

- a) we shall collect, use, disclose and share Personal Data for the Purposes stated in this Policy;

- b) we shall be authorised to disclose such Personal Data to our authorised service providers and relevant third parties in the manner set forth in this Policy and in the DPA; and
- c) each Relevant Person has consented to our collection, use, disclosure and/or process of his/her Personal Data for the Purposes stated above, and such Relevant Person has been informed of and has accepted this Policy.

If you do not wish for us to continue to use your Personal Data or the Personal Data provided by you to us for any of the Purposes at any time in the future, you must notify us in writing to withdraw your consent (see Section 13). Depending on the circumstances, your withdrawal of consent may result in our inability to provide you with the services and/or products that we have been offering to you, and consequently, may result in the termination of your relationship and/or accounts with us.

Where the personal data protection laws of the relevant jurisdictions permit us to collect, use or disclose the Personal Data without your or the Relevant Person's consent, such permission granted by law will continue to apply.

## **5. Disclosure, Sharing and Transfer of Personal Data Overseas**

Subject to the provisions of any applicable law, Personal Data may be disclosed or transferred to, shared with or kept by the following entities, wherever located, for any of the Purposes or for processing for any of the Purposes:

- a) other members of the CLSA Group;
- b) any third party service providers, including archival management service providers, subject to the provisions of the DPA; (Upon request by you we may provide you (where available) with the privacy policies of third parties to whom we provide your Personal Data.)
- c) our professional advisers (including lawyers) and agents or third parties necessary for us performing/providing services to you (including our executing brokers, clearing houses and settlement agents);
- d) our auditors;
- e) any person to whom disclosure is permitted or required by law or any court order;
- f) any local or foreign government agencies, regulatory authorities and statutory bodies having jurisdiction over us; and
- g) any of their respective successors and assigns.

To the extent that we may need to transfer Personal Data outside the relevant jurisdiction, we shall do so in accordance with the personal data protection law of that jurisdiction to ensure that we provide a standard of protection to the Personal Data so transferred that is comparable to the protection under that jurisdiction.

## **6. Access and Correction**

If you would like to obtain access and make corrections to your Personal Data, you may contact us in writing at the address set out in Section 13 below referencing 'Data Protection Policy'.



## **7. Retention**

Personal Data will be held for as long as it is necessary to fulfil the purpose for which it was collected or as required or permitted by applicable laws. We shall cease to retain Personal Data, or remove the means by which the Personal Data can be associated with particular individuals, as soon as it is reasonable to conclude that the purpose for which that Personal Data was collected is no longer being served by retention of the Personal Data and retention is no longer necessary for legal, regulatory or business purposes.

## **8. Data Security**

We have taken and will continue to take reasonable efforts to protect Personal Data in our possession or control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.

While we strive to protect your Personal Data, we cannot ensure the security of any Personal Data which you may have transmitted to us via methods using an unsecure browser, and we urge you to take every precaution to protect your Personal Data and use a secure browser.

## **9. Updates to the Data Protection Policy**

We may update this Policy to ensure that it is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Such changes will be posted on our website.

Such changes to our Policy shall apply from the time that we post the same on this website <https://www.clsa.com/terms-of-business/> . Your continued use of our service will be taken as acceptance of and consent to the updated Policy.

## **10. Cookies**

A cookie is an alphanumeric identifier which we transfer to your hard drive through your web browser when you visit our website. It enables our own system to recognise you when you visit our website again and improve our service to you. The information is used to track visitor use of the website and to compile statistical reports on website activity. For further information about cookies visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). Cookies may also be used to compile aggregate information about areas of our website that are visited most frequently. This traffic information can be used to enhance the content of our website and make your use of it easier. If you wish to reject our cookie, you can configure your browser to do so. However, in a few cases some of our website features may not function if you remove cookies from your browser.

## **11. Third Party Websites**

We have not reviewed any of the websites linked by our website. We will be not responsible for the content of any other websites or pages linked to or linking to our website and usage of any of such linked websites or pages. Such links are provided solely for your convenience and information. Following links to any other websites or pages shall be at your own risk.

## **12. Rights of the Data Subjects**

Under the DPA, you have the right to request in writing to:

- be informed whether Personal Data are being, or have been processed
- object to the processing of his/her Personal Data;
- reasonable access to his/her Personal Data;



- dispute inaccuracy or error in his/her Personal Data;
- suspend, withdraw or order blocking, removal or destruction of his/her Personal Data;
- damages sustained by you due to our processing of such informed inaccurate, incomplete, outdated, false, Personal Data or damages sustained due to unlawfully obtained or unauthorized use of your Personal Data; and
- data portability.

### **13. Contacting Us**

For any queries, clarifications, questions or comments about the collection, use or disclosure of your Personal Data or this Policy, you may contact us in writing at the address below referencing 'Data Protection Policy':

Data Protection Officer  
CLSA Philippines, Inc.  
19F Tower 2, The Enterprise Center  
6766 Ayala Avenue cor. Paseo de Roxas,  
Makati City, Philippines 1200  
Email: [dpo-ph@cls.com](mailto:dpo-ph@cls.com)  
Telephone: +63 8860 4000