

Results of Compliance Checks on 10 Selected Banks

	Guidance Note requirement / recommendation	Hang Seng	Standard Chartered	Bank of China	Bank of East Asia	DBS	Bank of Communication	China Construction Bank	Citic Bank International	Wing Lung	Dah Sing	Overview
1.	Are customers informed of the purpose of use of their data and the class of data transferees in clear terms so that customers could ascertain with a reasonable degree of certainty how their data could be used and who could use them?	Generally meet the requirements stipulated in the Guidance Note	Generally meet the requirements stipulated in the Guidance Note	Generally meet the requirements stipulated in the Guidance Note	Generally meet the requirements stipulated in the Guidance Note	Generally meet the requirements stipulated in the Guidance Note	Generally meet the requirements stipulated in the Guidance Note	Generally meet the requirements stipulated in the Guidance Note	Generally meet the requirements stipulated in the Guidance Note, except for the specificity of the class of transferees in the PICS	Generally meet the requirements stipulated in the Guidance Note	Generally meet the requirements stipulated in the Guidance Note	Generally meet the requirements stipulated in the Guidance Note
2.	Is the font size of the Personal Information Collection Statement (“PICS”) too small?	Font size enlarged	Font size enlarged	Font size enlarged	Font size enlarged	Font size enlarged	Font size enlarged	Font size enlarged	Font size enlarged	Font size enlarged	Generally readable	Generally readable
3.	Is a separate check box provided in the credit card application form or PICS for customers to exercise their right to opt-out from direct marketing of unrelated products/services?	No (customers may opt out through separate channel)	Yes	No (customers may opt out through separate channel)	No (customers may opt out through separate channel)	Yes	Yes	No (customers may opt out through separate channel)	Yes	No (customers may opt out through separate channel)	No (the bank has agreed to gradually add the “opt-out” box in its new credit card application forms)	Only 4 banks followed the recommendation of the Guidance Note to provide a separate check box.

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4.	Is a separate check box provided in the credit card application form or PICS for customers to opt-out from sales of his personal data to third parties for monetary gain?	No Deny selling personal data Current PICS states that the Bank “may or may not be remunerated” for using customer’s personal data for marketing	No Deny selling personal data Current PICS states that the Bank “may or may not be remunerated” for using customer’s personal data for marketing	No Deny selling personal data Current PICS states that the Bank “may or may not be remunerated” for using customer’s personal data for marketing	No Deny selling personal data Current PICS states that the Bank “may or may not be remunerated” for using customer’s personal data for marketing	No Deny selling personal data Current PICS states that the Bank “may or may not be remunerated” for using customer’s personal data for marketing	No Deny selling personal data The Bank does not hint any sale of personal data in its PICS at all	No Deny selling personal data Current PICS states that the Bank “may or may not be remunerated” for using customer’s personal data for marketing	No Deny selling personal data Current PICS states that the Bank “may or may not be remunerated” for using customer’s personal data for marketing	No Deny selling personal data Current PICS states that the Bank “may or may not be remunerated” for using customer’s personal data for marketing	No Deny selling personal data Current PICS states that the Bank “may or may not be remunerated” for using customer’s personal data for marketing	<i>All the banks did not follow this recommendations</i>
5.	Have convenient channels been provided to customers for enquiry of their personal data?	Address & fax no. provided	Address & hotline phone no. provided	Address & fax no. provided	Address, telephone & fax no. provided	Only address provided	Address, phone & fax no. provided	Address, phone & fax no. provided	Address & fax no. provided	Address, phone & fax no. provided	Address & fax no. provided	<i>Only 5 banks provided hotlines for customers to enquire about their personal data, while the remaining 5 banks provided only an address and a fax number.</i>