



Experience Sharing on Good Data Governance

Sidney Siu, Chief Compliance Officer, ZA Bank





One-stop digital financial platform for all your financial needs



Digital Banks and Traditional Banks Same level of Customer Data and Privacy Protection



Customers provide their personal data to the Bank based on a relationship of trust. We are expected to process the personal data in a manner which is respectful, beneficial and fair.

Code of Banking Practice Equitable and Fair Treatment of Customers

Protection of Consumer Data and Privacy

Disclosure and Transparency

HKMA Circular / Guide

Customer Data Protection

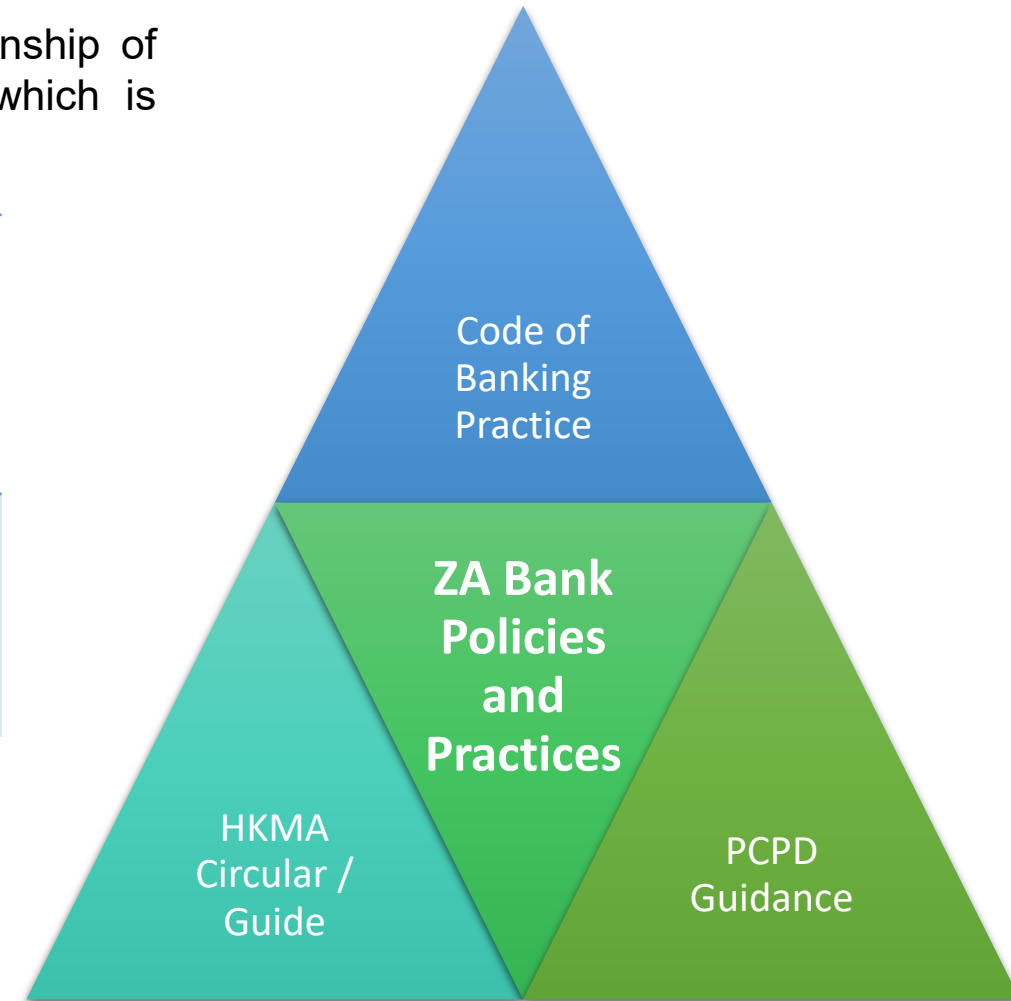
Sound Practices for Customer Data Protection

Practical Guide on Cloud Adoption

PCPD Guidance

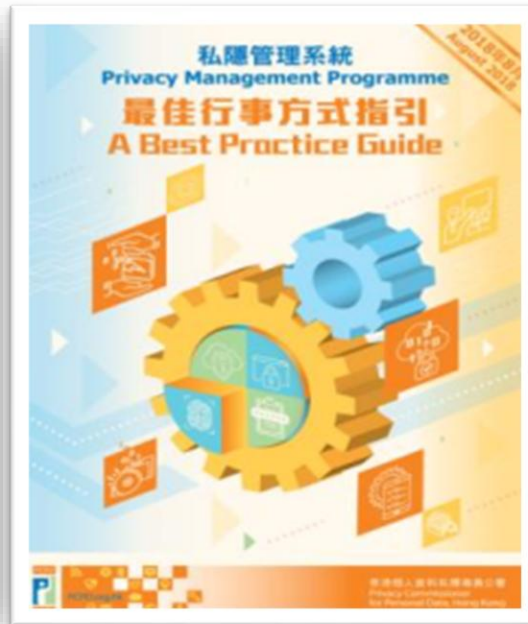

Guidance on the Proper Handling of Customers' Personal Data for the Banking Industry

Best Practice Guide on Privacy Management Programme



(Non-exhaustive list for reference only)

ZA Bank's Personal Data Privacy Management Programme

**ZA Bank Limited
Personal Data Privacy Management Programme Manual**

Issuer	Compliance Department
Activity Business Line	All Business Lines
Function Domain	Data Protection Officer
Involved Process	Data Protection Officer

“The Commissioner is pleased to note that ZA Bank appointed a Head of the Compliance Department and a dedicated Data Protection Officer to continuously supervise its Privacy Management Programme (including all relevant procedures, trainings, monitoring or auditing, documentation, evaluation and other follow-up actions in relation to the collection, holding, processing and use of personal data). The Head of the Compliance Department and the Data Protection Officer reported directly to the ZA Bank’s top management.”

PCPD Inspection Report, Oct 2023




ZA Bank's Personal Data Privacy Management Programme Manual

Governance Framework



- Senior Management Buy-in
- Chief Compliance Officer's Leadership
- Regular Reports in Relevant Governance Committee Meetings




- Roles of Dedicated Data Protection Officer (DPO)
- DPO Annual Action Plan
- Training and Promotion of Staff Awareness




- Departmental Coordinators
- Personal Data Inventory
- Privacy Impact Assessment Template


Compliance with PDPO



- PICS and Privacy Policy
- Consent Management
- Customer Notification




- Direct Marketing
- Data Access and Correction Requests
- Introduction of Doxxing Offences




- Data Processor Management
- Recommended Model Contractual Clauses for Cross-border Transfer of Personal Data
- Data Breach Notification


Privacy by Design



- Customer Centricity
- Privacy-Protective Option as Default Choice
- Avoid Using Biased Language and Design



- Data Minimization
- Minimum Retention Period
- Data Security

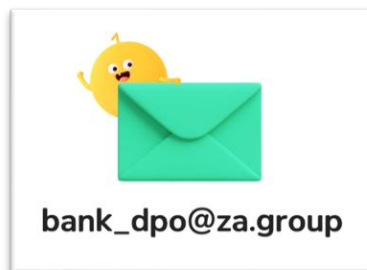



- Data Quality and Reliability of Algorithms
- Anonymisation
- Pseudonymisation

Highlight - PICS and Privacy Policy



- Comprehensive PICS aligns with industry practices.
- Privacy Policy in Q&A style makes it easier for customers to navigate.
- Include our commitment to using innovative technologies in a secured and responsible manner, including the use of Big Data and Artificial Intelligence (BDAI) to provide better services to our customers.
- For regulatory circulars involving data privacy implications, the Compliance Department and Data Protection Officer will assess whether there is any gap in the PICS and the Privacy Policy and propose necessary amendments.
- For New Product Assessment, the Product Manager is required to assess whether the existing PICS and Privacy Policy are still applicable to the new product. If it is necessary to update the PICS or the Privacy Policy, the revised version or the revision schedule should be available before the product launch.



 **ZA Bank**
Bank | Insure | Invest

Your Future Bank for Now

Hi there!





As Hong Kong's No.1 Digital Bank* and Outstanding Gold Award winner at the 2025 PCPD Privacy-Friendly Awards, ZA Bank puts you first — with full transparency on how we protect your data. Review our [Personal Information Collection Statement](#) and [Privacy Policy](#) to see how we're building a safer digital future, together.

What highlights should you know?

1. We will collect and use your personal data only when necessary, reasonable, and in good faith. We will let you make informed choices about our collection and use of your personal data in accordance with the Personal Data (Privacy) Ordinance and industry practice.
2. We will ensure that banking experiences are not only innovative, but also safe and respectful of user privacy.
3. We would like our customers to receive updates on the latest activities and promotions through various channels. You can contact our customer service hotline at 3665 3665 to update your direct marketing notification settings. We respect your choices.

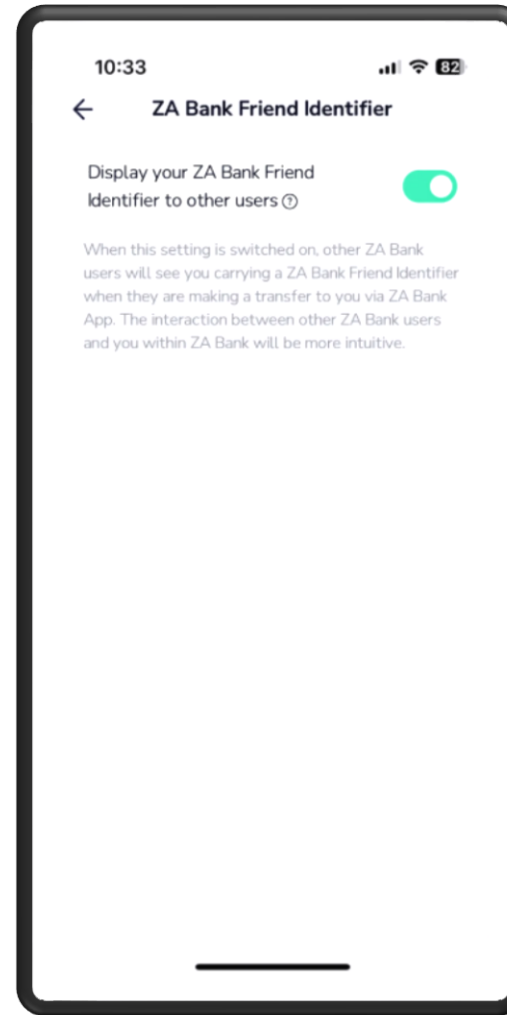
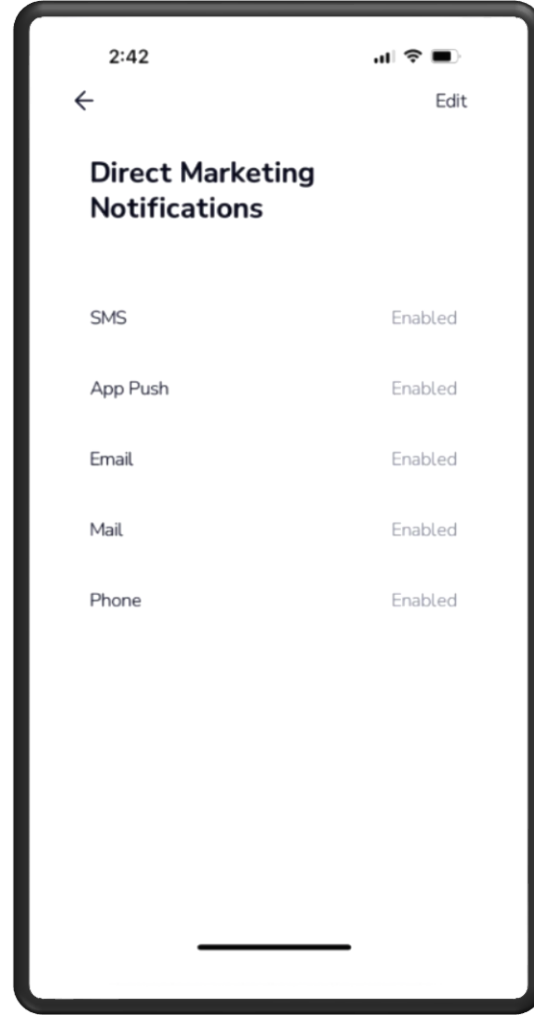
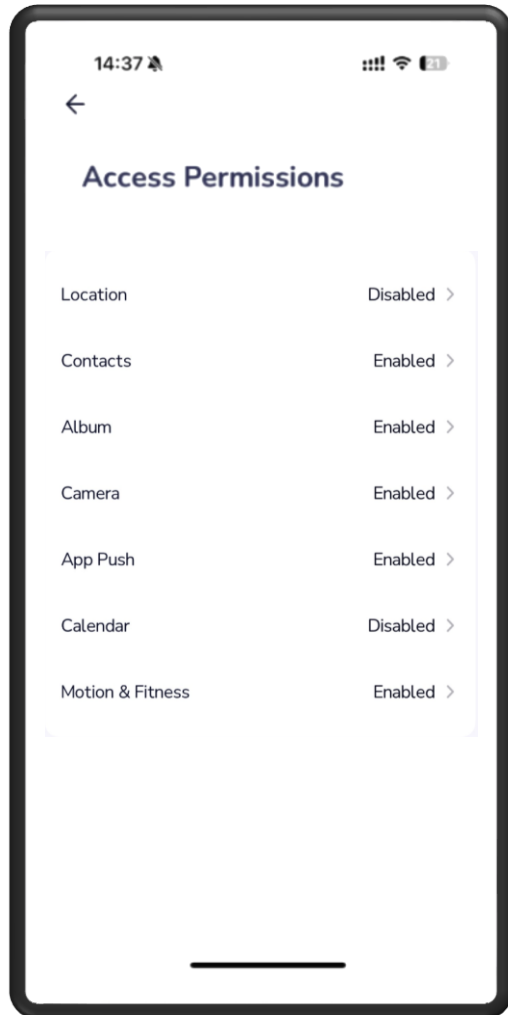
If you have any questions or suggestions about our work in protecting your data privacy, you can get in touch with our Data Protection Officer by email: bank_dpo@za.group.

ZA Bank | Hong Kong's No.1 Digital Bank*

    The top-rated HK retail banking app on Google Play^


(Annual notification to all customers)

Highlight – 24x7 Privacy Options



Privacy. What you deserve, and how we protect you.

Zappy & Alfie
9-9-2024



In the digital age, safeguarding personal information is more crucial than ever. When you conduct transactions and entrust personal data to banks, do you know how banks collect, use, and protect your data? 🤖

In this blog post, we will cover the privacy settings in the ZA Bank App, our privacy policy, and how you can make informed choices about your data. 🛡️

Privacy principles embedded in the ZA Bank App
We prioritise your privacy and data security. We value transparency, and you are always in control of your data:

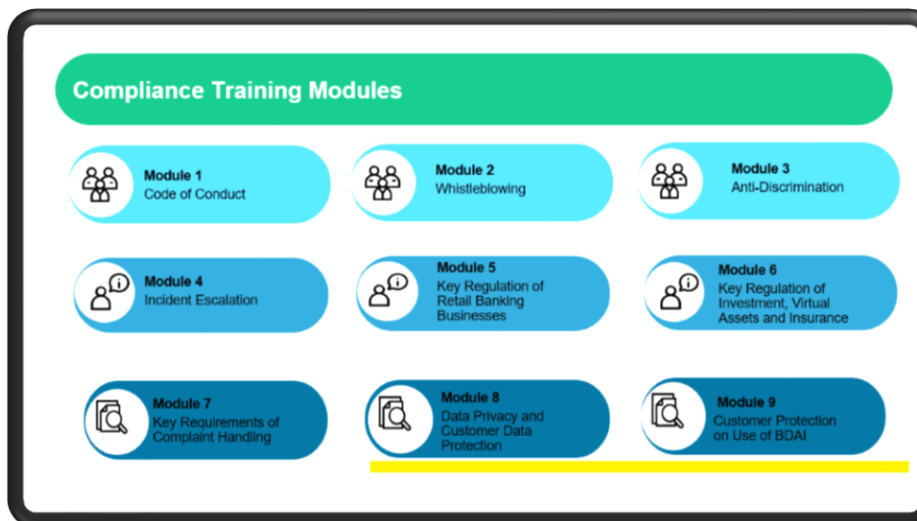
Staff Awareness of Privacy and Data Protection



ZA Knowledge Management

Let's be respectful, beneficial and fair to customers

- Transparency – Adopt plain and user-friendly languages in prominent privacy notices
- Minimum personal data collection and retention
- Clear and genuine options to customers
- Effective means to erase or rectify obsolete or inaccurate personal data
- Reliability of algorithms - For example, credit scoring algorithms make assessment on customers' creditworthiness by mixing and analysing sheer volume of public, private and personal data collected from multiple sources. Together with the personal data generated during the interaction between the customer and the Bank or may be inferred by data analytics, there is a risk that the data inputted into the assessment is inaccurate, biased, irrelevant or outdated.
- Security of data - Both administrative (e.g. policies and procedures) and technical (e.g. logical access control and encryption) security measures should be in place
- Privacy Impact Assessment and Privacy By Design – Please feel free to consult Data Protection Officer
- To combat doxing acts that are intrusive to personal data privacy, the Personal Data (Privacy) (Amendment) Ordinance 2021 came into operation on 8 October 2021. There are serious legal consequences of doxing. To avoid breaking the law, please think twice before publishing or forwarding any messages on the internet or social media.



Posters displayed in ZA Bank's office areas

New Data Privacy Training Materials – Data Protection in Banking/Financial Services (source from PCPD)

BANK_All 各位同學：

個人資料私隱專員公署（私隱公署）最新Q3有關對銀行及金融業人員的培訓資料已上載到合規KM。由於內容接近160張PPT，為提升培訓效率，DPO 借AI之助，從中提煉出以下4個學習個案，供大家快速閱讀：

1. 「擁抱客戶」但不可「捆綁同意」

在數碼化時代，數據私隱保護已成為企業和個人都不可忽視的重要議題。尊重用戶選擇，提升透明度，有助打造值得客戶信任的數碼環境。首先分享一個關






Anti-Fraud Measures and Public Education

【ZA Bank】SCAM ALERT: 🚨
Don't open any "phishy" links!

Zappy and Alfie
 7-16-2025

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ALERT
 Don't open "phishy" links!


It's unfortunate that there are so many fraudsters around nowadays! They can use WhatsApp to steal personal accounts, conduct fake recruitment, commit online shopping fraud and more! You really need to be more careful!

🔒 Common WhatsApp fraud methods:

1. Borrowing money from friends and relatives

Fraudsters can pretend to be your friends and relatives. They will say that they have updated their numbers and are in a hurry to borrow your money! If you receive messages of this kind, you must call to confirm the identity of the other party, and do not transfer any of your money directly.

**Opening an account?
 Avoid these 3 red flags!**



Nowadays, so-called "agents" have been popping up, claiming they can help potential users open online banking accounts for a fee!

We at ZA Bank would like to remind everyone that we have not authorised any intermediary service to do so, and will not help you to open an account via agents or other intermediaries. If you're planning to refer a friend or family member, or are considering opening an account for yourself, please be aware of the following three major red flags:

- 🚫 **Red flag #1: Beware of agent account opening fees**

Some people claim to be "account opening experts" who promise "guaranteed success" for a fee.

Debunked: ZA Bank does not charge account opening fees for individual customers, and any account opening fee for business customers is charged according to the Business Banking Tariff. Each user must meet the requirements and undergo a vetting process. We reiterate that we do not authorise any person or company to charge account opening fees!

- 🚫 **Red flag #2: Do not disclose personal information**

Beware of scammers who may ask you to enter personal information through fake links. Never hand over important documents like your ID card and proof of address to a third party for safekeeping!

Reminder: It is best to open an account personally to protect your own information and financial security.


- 🚫 **Red flag #3: Beware of suspicious links or fake websites**

When browsing the Internet, be wary of suspicious links or fake websites claiming they can assist you with

Keeping your money safe: Why we sometimes hit pause

Zappy and Alfie
 12-22-2025

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At ZA Bank, we love speed. We built this digital bank so you could open an account in minutes and get your money in seconds. We know that's why you're here.

But there's something we care about even more than being fast: **keeping your money safe**. The reality is that financial crime in Hong Kong is rising. According to the latest Police Force statistics, **28,379 fraud cases were reported in the first eight months of this year alone, amounting to financial losses of HKD 5.02 billion!** These losses are the hard-earned money of countless people, and fraudsters' tactics are getting smarter.

**全新 24 x 7 防騙專線
 3665 3660 登場**

小心真偽

1:34

WhatsApp

Saturday 11:21 AM

你的賬號因違反安全條例，請登陸安全中心 [t/WS-XXXX](#) 進行驗證，如未在 12 小時內完成驗證賬戶將被停止使用！

Thank You

