

# Shareholder/Bondholder Data Privacy Notice

# Your Privacy

Your privacy is important to us. This notice (Privacy Notice) applies to personal information we collect from you or from third parties as a shareholder and/or bondholder of HSBC Bank Malta p.l.c. (HSBC Malta) If you are an HSBC customer, or otherwise have a relationship with us, we may also have provided you with a separate privacy notice setting out how we use your personal information, which will also apply. You may also view that privacy notice by visiting the website for the product or services we provide you at <https://www.hsbc.com.mt/1/2/mt/> or by contacting your customer service team.

Some of the links on this website may lead to HSBC or non-HSBC websites with their own privacy notices, which may be different to this notice, and you should read those notices carefully.

For the purposes of this Privacy Notice the Data Controller is HSBC Bank Malta p.l.c. having registration number C 3177 and its registered office at 116, Archbishop Street, Valletta, VLT 1444, Malta. We have also set out contact details towards the end of this notice.

## Information we may collect from you and other sources

For shareholders and/or bondholders, our main source of information comes from the Malta Stock Exchange (MSE). We may collect and process the following information about you:

- Information that you provide to us for the purposes of acquiring shares and/or bonds or where you are an HSBC Malta customer we may also use information collected for this purpose in order to be able to manage your relationship with us as a shareholder and/or bondholder;
- Information that we obtain or learn, such as information about the browser or device you use to access our website, how you use this site and the pages you visit, traffic and location data;
- Information we obtain from the Malta Stock Exchange which process applications for the acquisition of shares and/or bonds in Maltese public companies such as HSBC Bank Malta p.l.c.

The main information that is collected is the following:

MSE Number; personal identification number; name; address; bank account number; secondary holder's name; usufruct name; address and minor's name (if holding is in the name of a minor) as applicable.

## How we use your information

We shall only use your information where we have your consent or where we have another lawful reason for using it. Unless we say otherwise below, we shall use your personal information on the basis that it is within our legitimate interests in managing our relationship with you as a shareholder and/or bondholder. We may use information provided or obtained from third parties to:

- Respond to your queries and feedback (for example, if you have asked a question or submitted feedback via the site);
- Carry out our obligations from any contracts entered into between you and us;
- Pay you as shareholder dividends and/or pay out bondholder bond interest;
- Invite you to attend and vote at Shareholders Meetings and send you shareholder information such as the Annual General Meeting pack.

We also use information to meet our compliance obligations, to comply with other laws and regulations and to share with regulators and other authorities that HSBC Group companies are subject to. This may include using it to help detect or prevent crime (including terrorism financing, money laundering and other financial crimes). We shall only do this on the basis that it is needed to comply with a legal obligation, it is in our legitimate interests and that of others or to prevent or detect unlawful acts.

Our shareholders' and/or bondholders' registers are maintained by the MSE and personal data is collected by the MSE when you acquire shares and/or bonds in HSBC Bank Malta p.l.c. We however act as an intermediary between you as the shareholder and/or bondholder and the MSE and therefore provide your personal data to the MSE for the purposes of maintaining and updating of the shareholder and/or bondholder register.

### **Who we shall share your information with**

We may share your information if we have a legitimate interest in doing so or where we need to in order to satisfy our obligation towards you and our obligations at law (for example, to manage risk, verify your identity, to combat fraud, abuse of our site or services, to send you information on shareholder meetings), or where you have agreed to us doing so.

We may share your information with others including: other HSBC Group companies and any of our service providers; anyone who we are under an obligation to disclose information to or where it is in the public interest (for example to prevent or detect fraud, abuse of our site or services).

### **Cookies**

We use cookies and similar technologies to distinguish you from other users of this site, to improve your experience when accessing this site, and to improve the site. Detailed information on the cookies we use and the purposes for which we use them are set out in our Cookie Policy.

### **How long we shall keep your information**

We keep information in line with our data retention policy. For example, we normally retain your information as a shareholder and/or bondholder in so long as it forms part of our register of shareholders and/or bondholders for 10 years after HSBC Malta has been struck off in line with our legal obligations. We retain information to comply with legal or regulatory requirements or for our legitimate purposes, e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc. and may sometimes need to keep it for a longer period; if we do not need to retain it for as long, we may delete, destroy or anonymise it sooner.

### **Transferring your information overseas**

Your information may be transferred to and stored in locations outside the European Economic Area (EEA), including countries that may not have the same level of protection for personal information. When we do this, we will ensure it has an appropriate level of protection and that the transfer is lawful.

You can obtain more details of the protection given to your information when it is transferred outside the EEA by contacting us using the details in the 'More details about your information' section below.

### **Your rights**

You have a number of rights in relation to the information that we hold about you. These rights include:

- The right to access information we hold about you and to obtain information about how we process it;
- In some circumstances, the right to withdraw your consent to our processing of your information, which you can do at any time. We may continue to process your information if we have another legitimate reason for doing so;
- In some circumstances, the right to receive certain information you have provided to us in an electronic format and/or request that we transmit it to a third party;
- The right to request that we rectify your information if it is inaccurate or incomplete;
- In some circumstances, the right to request that we erase your information. We may continue to retain your information if we are entitled or required to retain it; and,
- The right to object to, and to request that we restrict, our processing of your information in some circumstances. Again, there may be situations where you object to, or ask us to restrict, our processing of your information but we are entitled to continue processing your information and/or to refuse that request.

You can exercise your rights by contacting us using the details set out in the 'More details about your information' section below. You also have a right to complain to the Malta Information and Data Protection Commissioner's

Office by visiting <https://idpc.org.mt>, or to the data protection regulator in the country within the EEA where you live or work.

### **How we keep your information secure**

We use a range of measures to keep your information safe and secure which may include encryption and other forms of security. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information.

### **More details about your information**

If you would like further information on anything we have said in this Privacy Notice, or to contact our Data Protection Officer, contact us at Legal Office, 32, Merchant Street, Valletta VLT 1173 'for the attention of the DPO'.

This Privacy Notice may be updated from time to time, and you will always be able to find the most recent version on this site.

#### **HSBC Bank Malta p.l.c.**

Company Secretary,  
Head Office, 116, Archbishop Street,  
Valletta VLT1444, Malta  
Tel: (+356) 2380 2380/2405/2471

Registered in Malta number C3177.  
Registered Office: 116, Archbishop Street,  
Valletta VLT 1444, Malta  
HSBC Bank Malta plc is regulated and licensed  
to conduct investment services business by the  
Malta Financial Services Authority.