

Data Privacy Notice for Suppliers of HSBC Bermuda: Collection, processing and sharing of your information

This privacy notice explains how we ('we' or 'us' or 'HSBC Bermuda' is HSBC Bank Bermuda Limited and its Bermuda incorporated subsidiary companies) will use the information you provide, or which we collect, in connection with any sourcing activity and any subsequent agreement(s) with us. Failure by you to supply such information may result in us being unable to enter into a commercial relationship and/or agreement(s) with you.

By participating in any sourcing activities or entering into any agreements with us, you agree that we may use your information in accordance with this notice. The data user in relation to your information is the HSBC Bermuda company who may enter into a services agreement with you.

The information that we collect from you may include information relating to an employee, director or any other person who exercises control over an entity ("Controlling Person") who enters into a services agreement with us. For a trust, a Controlling Person may include a settlor, a trustee, a protector, beneficiaries and classes of beneficiaries. We may also collect information relating to individuals connected with a director, an entity or a Controlling Person, such as any guarantor, a director or officer of a company, partners or members of a partnership, or beneficial owner, trustee, settlor or protector of a trust, account holder of a designated account, payee of a designated payment, your representative, agent or nominee, or any other persons or entities with whom you have a relationship that is relevant to your relationship with HSBC Bermuda ("Connected Person"). Prior to providing information to us relating to a Controlling Person, a Connected Person or any other person, you shall ensure that you have a lawful basis to use their personal information (for example: the individual has consented to your sharing their personal information with us or you are under a legal obligation to share their personal information with us) and you have notified the individuals that (a) you will share their personal information with us and (b) we will use their personal information with as set out in this notice.

We may collect, use and share the information you provide to us, subject to local data privacy laws, for reasons connected to our business and relationship with you, including to:

- a. approve, manage, administer or effect the services agreement between us
- b. meet the compliance obligations of HSBC Bermuda or any HSBC affiliate
- c. conduct financial crime (which includes money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions, and any act or attempt to circumvent or violate any law relating to these matters) risk management activity (which will include making further enquiries as to the status of a person or entity, whether they are subject to a sanctions regime, or confirming their identity and status)
- d. if applicable, collect any amounts due and outstanding from you
- e. conduct credit or other financial checks and obtaining or providing credit references (where you are a potential tenant of the HSBC Bermuda)
- f. enforce or defend our rights
- g. verify your identity
- h. understand how diverse and inclusive our suppliers are
- i. undertake Environmental, Social and Governance (ESG) supplier audits.

In carrying out these purposes we may transfer and disclose your (or any Controlling Party('s) or Connected Person('s)) information to:

- a. any member of HSBC Bermuda or any HSBC affiliate
- b. any sub-contractors, agents, advisers or service providers of HSBC Bermuda or any HSBC affiliate (including their employees, directors and officers)
- c. any regulatory authorities of HSBC Bermuda or any HSBC affiliate
- d. agencies and other companies for use in credit decisions and fraud prevention which is important for risk management
- e. any third party in connection with a transfer, disposal, merger or acquisition of business by us or any member of HSBC Bermuda or HSBC affiliate wherever located, including in jurisdictions which do not have data protection laws providing the same level of protection as the jurisdiction in which you are based. Your information will be protected by appropriate security and technical measures to keep your information secure. Such information may be transferred to a place outside the country of your residence.

Accessing your information

Bermuda's data privacy laws allow you to make a written request for either access to personal data we hold about you, the purpose for which the personal data has been and is being used and the types of persons to whom and circumstances in which the personal data has been disclosed; or to ask us to rectify or erase any inaccurate data.

More details about your information – how to contact us

You may contact our Privacy Officer (PO) by writing to:

Attention: The Privacy Officer
Middle Office
37 Front Street, Hamilton HM11

You may exercise your rights, by writing to:

Attention of Rights of Individuals Fulfilment (ROIF)
Middle Office
37 Front Street, Hamilton HM11

You may also contact your usual HSBC contact who will be able to direct your query. As at the date of this notice there is a fee charged for providing this information to you.

You may also review our privacy notice for Corporate Clients located at www.business.hsbc.bm for more information about our approach to data privacy in Bermuda.

This notice was last updated on 20 March 2025.