DEUTSCHE BANK (CHINA) CO., LTD. PRIVACY NOTICE

1. Why are you receiving this Privacy Notice ("this Notice")?

You are receiving this Notice because you are either a banking service receiver, private/wealth management client, authorized representative, ultimate beneficial owner, guarantor, beneficiary, or individual contact or representative of a client or of a service provider (all referred to below as "**you**").

This Notice also applies (i) to visitors of our website, users of our mobile banking applications, prospective clients or those who apply to use or receive our products and services and their related parties, (ii) to those who undertake any business or make any transaction with us, (iii) when you participate in any of our marketing events and surveys, or (iv) when you contact or correspond with us in any way, whether the information is provided by yourself or your related parties, or collected or acquired by us from other sources according to law or regulation, or based on your or related parties' consent or authorization.

This Notice explains what categories of Personal Information (as defined below) we collect about you and how we use it. This Notice also outlines your rights under the Personal Information Protection Law ("**PIPL**"). We want you to understand how and why we collect, use, disclose or otherwise process your Personal Information.

Please read and understand this Notice carefully before using our products and services. By using our products and services or providing Personal Information to us, you agree to our collecting, use, processing, storage, disclosure, and transfer of personal information in accordance with this Notice.

This Notice is provided in English and Chinese, and for any discrepancy, the Chinese version shall prevail.

Personal Information means any and all kinds of information relating to identified or identifiable natural persons that is recorded by electronic or other means. The term excludes anonymized information.

Sensitive Personal Information means the personal information of which the leakage or illegal use could easily lead to the violation of the personal dignity of a natural person or harm to personal or property safety, including information on biometric identification, religious beliefs, specific identity, health care, financial accounts, and personal whereabouts, and personal information of minors under the age of fourteen.

Relevant Person(s) means any natural person whose Personal Information is provided to us by you, your affiliates, any of your representatives and/or any other party which we reasonably believe to have the legitimate rights to share the information with us.

Where we use "**we**," "**us**" and "**our**" in this Notice, we are referring to Deutsche Bank (China) Co. Ltd. (including its headquarters and branches in the People's Republic of China or PRC). Our contact information can be found at the end of this Notice.

When you provide Personal Information to us, we act as a **"personal information processor."** It means:

(i) we "control" the Personal Information you have provided, including making sure it is kept secure; and

(ii) we make certain independent decisions on how to use and protect your Personal Information – but only to the extent that we have informed you about the use and/or obtained consent from you, or are otherwise permitted by law.

2. What Personal Information do we collect about you and what do we do with it (methods of processing)?

We collect Personal Information that is related to our business, required to fulfill statutory obligations, or permitted to be collected by other applicable laws and regulations. The types of Personal Information we collect may include but are not limited to:

(i) Name, gender, specimen signature, contact details (such as residential address, telephone/mobile number, and email address);
(ii) Employer (e.g., in case of a client representative data or signatory), employment history, qualifications, and educational details;
(iii) Information relating to our business relationship and relevant services, including data derived from your usage of our IT platforms (including electronic communications), mobile apps, recorded telephone lines, office building access, and from your engagement with our marketing activities;
(iv) KYC (Know-Your-Customer) information and other personal information needed for client due diligence, such as passport details, social security number, tax identification number, national ID, driver's license, date and place of birth, domicile, marriage, tax status, educational background, source of funds, source of wealth, rationale for use of corporate structures, relationships and affiliations, including those with public officials, and criminal record;
(v) Financial information, such as credit worthiness, bank account details, income, pension, investments, assets, liabilities, outgoings, investment objectives, activity, experience or strategy, risk tolerance and transaction history;
(vi) Product-specific contractual data and product-specific transactional data; and
(vii) Location information and other device and network-related information when you visit our website, such as internet protocol (IP) address, cookie identification, log-in information, network logs, and other network identity information.

The Personal Information we so collect may be in paper, electronic or any other forms.

If we collect Sensitive Personal Information, we will use it only for specific purposes and in compliance with the requirements of the PIPL and other applicable laws.

Unless otherwise restricted by applicable laws or regulations, we may collect Personal Information directly or indirectly through communications and interactions with you and your related entities, any of your respective representatives, and/or any other party that we reasonably believe has a legitimate right to share Personal Information with us. **If you fail to provide such**

Personal Information, we may not be able to provide you with the relevant products or services (or any part thereof), use the relevant products or services (or any part thereof) provided by you or conduct other corresponding activities, or comply with any applicable laws, regulations or guidelines and norms of regulatory bodies (or other competent authorities).

When we collect your Personal Information, we will, as necessary to fulfill any of the purposes stated in Section 5, use it, process it, modify it, share it within Deutsche Bank (China) Co. Ltd., its branches and other entities within the Deutsche Bank Group, with third parties, including regulators, store it, and delete it.

3. Who might we share your Personal Information with?

When necessary to fulfill your instructions to us, perform our contract with you, and for the other purposes outlined in Section 5, **we may share Personal Information about you with a range of recipients**, including (but not limited to) the following:

- Credit reference or credit rating agencies (including without limitation, the Basic Financial Credit Information Database)
- Background screening providers
- Financial institutions, industrial associations, bank card organizations or information service provider
- Funds or any third party fund managers providing you or the relevant customer with asset management service through us
- Payment recipients
- Payment and settlement infrastructure providers
- Exchanges, clearing houses, clearing or settlement systems, market counterparties
- Anyone acting on your or the relevant customer's behalf according to your or the relevant customer's authorization or according to law, beneficiaries, account nominee, intermediary, correspondent and agent banks (e.g., those for CHAPS, BACS and SWIFT), upstream withholding agents, swap or trade repositories, companies in which you or the relevant customer has an interest in securities (where such securities are held by us for you or the relevant customer)
- Regulators, courts, public authorities (including tax authorities)
- Deutsche Bank Group entities

- Any contractor, subcontractor, agent, third party product or service provider, licensor, professional consultant, business partner, associated person or service providers of the Deutsche Bank Group
- Auditors, insurers, lawyers of the Deutsche Bank Group
- Potential purchasers of our business (or any area/unit)
- Any third party to whom we provide referral, agency or intermediary services
- Any party in connection with any business/asset transfer, restructuring, disposal (including securitization), merger, spin-off or acquisition transactions of the Deutsche Bank Group
- Any person or related party who has the right or obligation, acquires an interest or assumes risk in, or in connection with any product or service you receive from us, or any business you or the relevant customer handles with us or any transaction you or the relevant customer makes with us (for example, the person who provides or intends to provide any mortgage or other security for any of your or the relevant customer's debt to us, or the beneficiary of the insurance product that we distribute to you)

These recipients could be located outside of China.

When required by applicable laws and regulations, **we will inform you of matters related to our provision of Personal Information to our relevant entities, vendors and other third parties, including the name, contact information, processing purposes and methods of the recipients, type of Personal Information to be processed, and, if it involves data offshoring, the manner and procedure for exercising your relevant rights to the overseas recipients, as well as the transfer of personal information from overseas recipients to third parties**(**for specific information of the recipients, please refer to Appendix 1 and Appendix 2 of this Notice**), **and obtain the separate consent of Relevant Person(s) through you.**

If the recipient is a member of the Deutsche Bank Group, you can find the details of the Deutsche Bank Group member and its corresponding data privacy notice on its country webpage.

In the case that we entrust the processing of Personal Information to relevant entities and/or vendors, we will clearly stipulate with the entrusted organization the purposes, period, processing methods, types of Personal Information to be processed, protection measures, etc. of the entrusted processing in accordance with the requirements of laws and regulations, and

supervise the Personal Information processing activities of the entrusted organization and require it not to process Personal Information beyond the agreed processing purposes and methods. If the entrustment contract is invalid, void, revoked or terminated, we will request the entrusted organization to return, delete or anonymize the Personal Information in accordance with the contract.

In addition, **we may, in accordance with laws and regulations or agreements, transfer relevant Personal Information in connection with any reorganization (including the establishment of new, locally incorporated entities in China and the transfer of existing businesses in China to such new locally incorporated entities), merger, sale, liquidation, joint venture, assignment, transfer or other disposition of all or part of our business, assets or stocks (including in connection with any bankruptcy or similar proceedings).** In such cases, we will inform you of the name and contact information of the recipient and request the recipient to continue to abide by, and perform the obligations under this Notice, and to obtain your consent again if the recipient changes the original purposes or methods of processing.

Where we need to transfer or share your Personal Information, we will carefully assess the legitimacy, propriety, and necessity of the data sharing. We will comply with, require the recipient to take, all the data protection measures required pursuant to the PIPL and relevant laws and regulations.

4. Will we share your Personal Information with other countries/regions?

Deutsche Bank (China) Co., Ltd. is part of a global bank. Thus, information relating to you may, in line with the purposes described in Section 5, be transferred to countries/regions outside of China. If we use service providers in another country/region, we require them, through contractual undertaking, to apply the same level of protection as would be necessary under the PIPL. We will comply with the notice and consent requirements under the PIPL.

We also undertake to comply with any requirements or conditions for cross-border transfer of Personal Information that the state cyberspace authorities and other authorities/regulators may issue, and will update this section as may be necessary, either by an amendment of this Notice or through another means (for example, posting on our website).

5. Why do we process your Personal Information?

The purposes for which we process (e.g., use, store, retain, disclose or transfer) your Personal Information are summarized below:

1. Performance of contract
2. Compliance with a legal obligation (for example, compliance with anti-money laundering requirements, counter-terrorism financing laws, and sanctions laws; response to investigations or disclosure orders from the police, regulators, and tax or other public authorities)
3. Know-your-customer, due diligence and creditworthiness checks
4. Client and vendor relationship management
5. Storage and data processing
6. Business analysis or development/improvement of products, services, and processes
7. Activities relating to information security and building security, including use of CCTV recording
8. Recording of telephone lines and monitoring of electronic communications for business and compliance purposes
9. Prevention and detection of financial crimes
10. Evaluating, bringing or defending legal claims
11. Marketing of Deutsche Bank Group products
12. Regulatory reporting
13. Audits
14. Business restructurings

6. What are our legal bases for processing your Personal Information?

We will obtain your consent to the processing of your Personal Information in accordance with the PIPL. We will also seek your prior written consent before we use your Personal Information for purposes not covered in this Notice and in those circumstances where the PIPL or other relevant laws require us to do so.

You are entitled to withdraw your consent at any time. Note that withdrawing your consent does not render our prior handling of your Personal Information unlawful, and that it might impact on our ability to continue providing our services in the same way in the future. You may reach out to your usual business contact in Deutsche Bank (China) Co., Ltd. or the Data Protection Officer if you wish to withdraw your consent.

Nevertheless, you understand that in accordance with applicable laws and regulations, we do not need to obtain your or Relevant Person's consent to

collect, use or otherwise process Personal Information in each of the following scenarios:

(i) It is necessary for the conclusion or performance of a contract of which one party is an individual, or for the implementation of human resources management in accordance with the labor rules and stipulations established in accordance with the laws and the collective contract concluded under the laws;
(ii) We need to perform relevant statutory duties or obligations;
(iii) The Personal Information involved is disclosed to the public by the Relevant Person(s) per se, or obtained through other legal public channels, such as news reports or government information disclosure;
(iv) It is necessary to respond to public health emergencies, or to protect human life, health and property in an emergency; and
(v) Other circumstances stipulated by applicable laws and regulations.

7. Where do we obtain your Personal Information?

We will only hold data about you that is relevant in the context of business relationship that we have with you. Some of this information we will obtain directly from you, for example:

(i) From the forms and associated documentation that you completed when you opened an account with us or signed an agreement with us, or both;
(ii) When you provide or provided it to us in correspondence or conversations;
(iii) When you have made or make transactions with respect to your account; and
(iv) When you voluntarily subscribe to our newsletters, updates or alerts, or participate in surveys, marketing events, or other events we organize or sponsor.

We also obtain Personal Information from a range of other sources, which may include:

(i) Your employer;
(ii) Other Deutsche Bank Group entities, other companies and financial institutions;
(iii) Publicly available sources (e.g., the press, registers of companies or assets, internet websites, including social media platforms);

(iv) From providers of business-risk screening services, such as credit reference agencies, anti-fraud databases, sanctions list and databases of news articles;
(v) Tax authorities, including those that are based outside of China, if you are subject to tax in another jurisdiction; and
(vi) Governmental and relevant regulatory authorities to whom we have regulatory obligations.

We collect, process, and use personal information on our website in order to offer you even better products and services, best adapt our business processes to our clients' needs, and steer you to the most suitable product information and online banking applications. More information about our online privacy policy and how we use cookies can be found on Deutsche Bank's webpage.

8. How long will we keep your Personal Information for?

We will retain Personal Information only within the period required by laws and regulations and necessary to achieve the purposes stated in this Notice (see Section 5). In making decisions about how long to retain data, we take account of the following:

- The termination date of the relevant contract or business relationship;
- Any retention period required by law, regulation or internal policy; and
- Any need to preserve records beyond the above period in order to deal with actual or potential audits, tax matters or legal claims.

If the deletion or anonymization of Personal Information is technically difficult to achieve, we will not perform any further processing other than storing and taking the necessary safety protection measures.

9. Are you under an obligation to provide us with your Personal Information?

You are not required by law to provide us with your Personal Information. **However, if you refuse to do so, we may not be able to provide you with the relevant products or services (or any part thereof), use the relevant products or services (or any part thereof) provided by you or conduct other corresponding activities, or comply with any applicable laws, regulations or guidelines and norms of regulatory bodies (or other competent authorities).** For example, in order to satisfy our anti-money laundering obligations, we have

to identify our clients, among other matters. This inevitably requires us to collect certain Personal Information from prospective clients.

10. Will we use your Personal Information for marketing purposes?

We may use your Personal Information to give you information about products and services offered by us or our Deutsche Bank Group affiliates that we think you may be interested in receiving. We will seek your consent before we use your Personal Information in direct marketing.

11. What data protection rights do you have?

By law you have the right to:

(a) **Request the restriction of processing** of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information, such as during the period of time it might take us to respond to your claim that the data is inaccurate or where the retention period has ended but you request further retention for establishing or defending a legal claim. You also have the **right to refuse the processing** of your Personal Information.

(b) **Request access** to and **copy** your Personal Information. This enables you to receive a copy of the Personal Information we hold about you and request information about Personal Information we obtained.

(c) **Request** us **to transfer** Personal Information you gave to another personal information processor.

(d) **Request correction** of the Personal Information we hold about you. This enables you to have incomplete, inaccurate or misleading data we hold about you to be corrected or supplemented.

(e) **Request erasure** of your Personal Information. This enables you to ask us to delete your Personal Information where, for instance the purpose for processing has been achieved, or our contractual relationship has ended, or you have informed us of the withdrawal of your consent, where our processing is based on your consent.

(f) **Withdraw your consent** to the processing of your Personal Information. See Section 6 above; and

(g) **File a complaint** with the appropriate court or authority under the circumstances recognized under the PIPL and in accordance with laws.

If you wish to exercise any of your rights in items (a) through (f), please get in touch with your usual contact at Deutsche Bank (China) Co., Ltd. or with our Data Protection Officer who will promptly act on your request.

Notwithstanding the foregoing, we may not be able to accommodate certain requests from you or Relevant Person(s) to the extent permitted by applicable laws, regulations or regulatory authorities or to comply with applicable laws, regulations or regulatory authorities.

This Notice shall not limit the rights of the Relevant Person(s) as the personal information subject under PRC laws.

12. How we protect your Personal Information?

Personal Information security is our top priority. We endeavour at all times to safeguard your Personal Information against unauthorized or accidental access, processing or damage. We maintain this commitment to information security by implementing appropriate physical, technical, and organizational measures to secure your Personal Information.

We maintain strict security to prevent unauthorized access to our systems that contain Personal Information. We exercise strict management over our staff members who may have access to your Personal Information, including but not limited to access controls applied to different positions, confidentiality obligation agreed by staff members, formulation and implementation of data privacy and information security-related policies and procedures, and data privacy and information security trainings to staff. These security measures are reviewed and updated regularly. Specifically:

Comprehensive information and security system

- Deutsche Bank's security policies and standards are codified and updated on a regular basis
- Deutsche Bank's information technology (IT) vendors must comply with those policies and standards
- IT vendors are also subject to Deutsche Bank´s risk assessments, and periodic vendor control assessments while they provide services

Well-established information network

- Close collaboration between Deutsche Bank security experts and external security firms, research groups and other companies
- Regular participation by Deutsche Bank security experts in security training and conferences

Regular controls

- Internal and external systems and electronic devices are regularly scanned to identify any vulnerabilities
- Exercises are carried out to regularly check IT systems and compliance with security guidelines and standards
- Constant monitoring of critical IT systems at Deutsche Bank

Employee awareness

- Regular security information training for employees worldwide
- Increasing risk awareness through other channels, e.g., videos and an internal information security website providing new information every month
- Our global cybersecurity hotline (88 777 9999) is available 24/7 and from anywhere. A global cyber security response process ensures that action can be taken at any time in response to potential security incidents

13. Protection of Minors' Personal Information

We may collect Personal Information of a minor when you use certain of our services. It is your responsibility to ensure that any Personal Information of a minor you provide to us is from legitimate source(s) and that you have obtained the corresponding authorization or consent from his/her parent or guardian. We will provide special protection for Personal Information of minors in accordance with laws and regulations. If it is found that the Personal Information of a minor has been processed in any business for corporate clients without the necessary authorization or consent, we will endeavor to delete the relevant Personal Information as soon as possible.

14. Changes to this Privacy Notice

We may update this Privacy Notice from time to time in order to clarify it or address changes in law or our business operations. This Privacy Notice, including updates to it, is accessible on Deutsche Bank (China) Co., Ltd.'s website: https://country.db.com/china/index.

We may also notify you in other ways about the processing of your Personal Information, such as in specific product documentation. If you have any questions regarding subsequent updates, please contact us.

Note that if you continue to use our products or services, you will be deemed to have accepted such updates.

15. Contact information/Data Protection Officer

Should you have any queries (or complaints) about the way in which we process your Personal Information or the specific information of recipients listed in Appendix 1 and Appendix 2, you may raise these with your usual contact at Deutsche Bank (China) Co., Ltd. or our Data Protection Officer at:

Deutsche Bank (China) Co., Ltd.
Legal Department
Attention: Data Protection Officer
Email: dpo_cn@list.db.com
Business address: 39F, Two International Finance Centre,
8 Century Avenue, Lujiazui, 200120 Shanghai, China
Tel.: +86 21 2080 2637

As of May 2024.[1]

[1] Note: last review of Oct 2026

Appendix 1 Domestic Personal Information Sharing List

Name of the Domestic Recipient	**Contact Information**	**Purposes of Sharing**	**Methods of Sharing**	**Types of Personal Information**
Third-party service providers, partners or counterparties of Deutsche Bank (China) Co., Ltd.	dpo_cn@list.db.com	To provide banking products/services to or conduct business with clients; and to maintain proper and secure operation of banking business and services, to prevent and control banking- related risks	Mail delivery, internal system business data processing, website	(1) Name, gender, specimen signature, contact details (such as residential address, telephone/mobile number, and email address); (2) Employer (e.g., in case of a client representative data or signatory), employment history, qualifications, and educational details; (3) Information relating to our business relationship and relevant services, including data derived from your usage of our IT platforms (including electronic communications), mobile apps, recorded telephone lines, office building access, and from your engagement with our marketing activities; (4) **KYC information and other personal information needed for client due diligence, such as passport details, social security number, tax**

				identification number, national ID, driver's license, date and place of birth, domicile, marriage, tax status, educational background, source of funds, source of wealth, rationale for use of corporate structures, relationships and affiliations, including those with public officials, and criminal record; (5) Financial information, such as credit worthiness, bank account details, income, pension, investments, assets, liabilities, outgoings, investment objectives, activity, experience or strategy, risk tolerance and transaction history; (6) Product-specific contractual data and product-specific transactional data; and (7) Location information and other device and network-related information when you visit our website, such as IP address, cookie identification, log-in information, network logs, and other network identity information.

The provision of Sensitive Personal Information in the above list is necessary for the purpose of sharing and does not adversely affect the personal rights and interests of the Relevant Person(s).

Appendix 2 Cross-border Transfers of Personal Information List

Name of the Overseas Recipient	Contact Information	Purposes of Processing	Methods of Processing	Types of Personal Information	Retention Period	Methods and Procedures for Exercising rights
Deutsche Bank Group entities	dpo_cn@list.db.com	To carry out unified clients and suppliers' affairs management, improve service and users experience	Personal Information Processor: collecting Personal Information from clients, suppliers or other reliable third parties, public websites, transferring through system or email Overseas Recipients: receiving Personal Information through systems or	Basic Personal Information: name, telephone number, email address	The Personal Information after the cross-border transfer will be retained in accordance with the terms and conditions of the applicable DB Group standards defined in Records Management Policy and the applicable subcontractor agreement, and	You may contact us directly through the contact information listed in this Notice to exercise your rights

			email for business management		retained for the time necessary to fulfill the relevant processing purpose.	
		To carry out unified clients due diligence, anti-money laundering and risk prediction management	Personal Information Processor: Transfer Personal Information through system or email Overseas Recipients: Receive Personal Information through system or email for risk management	Basic Personal Information: name, gender, birthday, nationality, family relationship, telephone number, fax number, home telephone number, work telephone number, capacity information, email address, delivery address, address **Personal Identity Information**: **ID number, passport, driver's license, taxpayer**		

				identification number Personal Financial Information: bank account number, bank relationship, predicted yearly income, estimated net assets, invest experience and purpose, resource of asset and fund, personal business information , banking information, CRS/FATCA information		

				Personal Work and Education Information: education background, work address, position, work experience Other Personal Information: marital status		

The cross-border provision of the Sensitive Personal Information mentioned in the above list is necessary for the purpose of processing and has no adverse impact on the personal rights and interests of the Relevant Person(s). After receiving personal information in accordance with the above list, the overseas recipients will only provide personal information to the following third-party recipients located outside the PRC when necessary to conduct business.

Name of the Third-Party recipients	**Contact Information**	**Purposes of Processing**	**Methods of Processing**	**Types of Personal Information**	**Retention Period**	**Methods and Procedures for Exercising rights**
Deutsche Bank		To carry out unified clients	Personal Information	Basic Personal Information: name,	The Personal Information after	You may contact us directly

Name of the Third-Party recipients	Contact Information	Purposes of Processing	Methods of Processing	Types of Personal Information	Retention Period	Methods and Procedures for Exercising rights
Group entities and their third party service providers, partners or counterparties	dpo_cn@list.db.com	and suppliers' affairs management, improve service and users experience	Processor: collecting Personal Information from clients, suppliers or other reliable third parties, public websites, transferring through system or email Overseas Recipients: receiving Personal Information through systems or email for	telephone number, email address	the cross-border transfer will be retained in accordance with the terms and conditions of the applicable Deutsche Bank Group standards defined in Records Management Policy and the applicable subcontractor agreement, and retained for the time necessary to fulfill the relevant processing purpose.	through the contact information listed in this Notice to exercise your rights

Name of the Third-Party recipients	Contact Information	Purposes of Processing	Methods of Processing	Types of Personal Information	Retention Period	Methods and Procedures for Exercising rights
			business management			
		To carry out unified clients due diligence, anti-money laundering and risk prediction management	Personal Information Processor: Transfer Personal Information through system or email Overseas Recipients: Receive Personal Information through system or email for risk management	Basic Personal Information**:** name, gender, birthday, nationality, family relationship, telephone number, fax number, home telephone number, work telephone number, capacity information, email address, delivery address, address **Personal Identity Information: ID number, passport, driver's license, taxpayer**		

Name of the Third-Party recipients	Contact Information	Purposes of Processing	Methods of Processing	Types of Personal Information	Retention Period	Methods and Procedures for Exercising rights
				identification number **Personal Financial Information: bank account number, bank relationship, predicted yearly income, estimated net assets, invest experience and purpose, resource of asset and fund, personal business information, banking information, CRS/FATCA information** Personal Work and Education Information:		

Name of the Third-Party recipients	Contact Information	Purposes of Processing	Methods of Processing	Types of Personal Information	Retention Period	Methods and Procedures for Exercising rights
				education background, work address, position, work experience Other Personal Information: marital status		

The Sensitive Personal Information mentioned in the above list is provided to third parties as necessary for the purpose of processing, and it does not have any adverse effects on the personal rights and interests of the Relevant Person(s).