



## **Mega International Commercial Bank Co., Ltd.**

### **Notice of Privacy and Protection of Personal Data**

Mega International Commercial Bank Co. Ltd, Panama Branch, (hereinafter Mega ICBC) makes this Privacy Notice available to you through the website [www.megabank.com.tw/abroad/panama/en-us](http://www.megabank.com.tw/abroad/panama/en-us) in order to inform you, in detail, about how we treat your personal data and protect your privacy and the information you provide us. In case of introducing modifications in the future on it, we will notify you through the website or through other means so that you can know the new privacy conditions introduced.

In compliance with Agreement No. 1 of 2022 issued by the Superintendency of Banks of Panama and Executive Decree No. 285 of May 28, 2021, which regulates Law 81 of March 26, 2019 on the Protection of Personal Data, we we inform you of the following:

#### **Responsible for the Treatment**

Company: Mega International Commercial Bank Co. Ltd  
Address: Balboa Avenue, Davivienda Tower, 9th Floor, Local A-B  
Telephones: 263-8108  
Email: [protecciondp\\_pnm@megaicbc.com](mailto:protecciondp_pnm@megaicbc.com)  
Website: [www.megabank.com.tw/abroad/panama/en-us](http://www.megabank.com.tw/abroad/panama/en-us)

If you have any kind of query, doubt or suggestion regarding how we use your personal data can be directed to the Personal Data Protection Officer through the email address [protecciondp\\_pnm@megaicbc.com](mailto:protecciondp_pnm@megaicbc.com).

#### **For what purpose do we process your personal data?**

At Mega ICBC we collect and process your personal information in general to manage the relationship we maintain with you. The main purposes that we have identified are the following:

- Offer banking, financial products, promotions or advertising, marketing and institutional campaigns.
- Perform internal statistical analysis, profiling, segmentation and internal audits.
- Location management directly or with third parties to update your data.
- Management of collections, consultations, attention to claims directly or by companies subcontracted by the Branch, including its Headquarters.
- Transmit and provide data for the purposes of services provided by external providers, accountants, lawyers, Headquarters, among others, that are necessary to perfect the banking product contracts signed with the Branch.

- Application of scientific, mathematical, algorithm, or any other similar procedures that are necessary in order to provide any type of score, punctuation, index to determine consumption habits, or behavior and to prepare market studies.
- Comply with contractual, regulatory, legal, and/or regulatory obligations.
- For the use of data analysis processes.

### **How do we collect your information?**

We collect your personal information through different means, but you will always be informed at the time of collection through informative clauses about the person responsible for the treatment, the purpose and legal basis of the treatment, the recipients of the data and the conservation period of your data. information, as well as the way in which you can exercise your rights in terms of data protection.

In general, the personal information that we process is limited to personal data (name and surname, date of birth, address, identity document, telephone number and email), contracted services and payment and billing information.

In the cases of personnel management and selection, we collect academic and professional data to be able to meet the obligations derived from maintaining the employment relationship or, where appropriate, become part of our payroll.

Mega ICBC uses email and this is another way to reach you. The information collected through the messages and communications we send may contain personal information that is available online and accessible to the public. These means of communication have their own privacy policies that explain how they use and share your information, so Mega ICBC recommends that you consult them before using them to confirm that you agree with the way in which your information is it is collected, treated and shared.

In addition, our facilities have a video surveillance system whose function is to guarantee the safety of people and property, so your image can be recorded simply by accessing them. These images are kept for a maximum period of three (3) months from their capture and will only be communicated to the Public Order Forces, State Security Bodies and judicial authorities if necessary.

### **User responsibility**

By providing us with your data through electronic channels, the user guarantees that they are over 18 years of age and that the data provided to Mega ICBC is true, exact, complete and up-to-date. For these purposes, the user confirms that he is responsible for the veracity of the data communicated and that he will keep said information properly updated so that it responds to his real situation, taking responsibility for false and inaccurate data that he could provide, as well as for damages direct or indirect, that may arise.

## **How long do we keep your information?**

At Mega ICBC we only keep your information for the period of time necessary to fulfill the purpose for which it was collected, to comply with the legal obligations that are imposed on us and to attend to the possible responsibilities that may derive from the fulfillment of the purpose for which it was collected. the data was collected.

In the event that you want to become part of our payroll and opt for one of our jobs, the data provided will become part of our job bank and will be kept for the duration of the selection process until you exercise your position. right of cancellation.

In any case, and as a general rule, we will keep your personal information as long as there is a contractual relationship that binds us or you do not exercise your right of cancellation and/or limitation of treatment, in which case, the information will be blocked without using it beyond its conservation, as long as it may be necessary for the exercise or defense of claims or some type of responsibility could be derived that had to be attended.

## **To whom do we communicate your data?**

In general, at Mega ICBC we share your personal information with our Parent Company (Mega International Commercial Bank Co. Ltd in Taipei, Taiwan) as a contingency for the continuity of the service offered and except for those assignments that we must make based on imposed legal obligations.

Although it is not a transfer of data, in order to provide the requested service it may be that third-party companies, which act as our suppliers, access your information to carry out the service that we have contracted for them. These managers access your data following our instructions and without being able to use it for a different purpose and maintaining the strictest confidentiality.

In the event that it is necessary derived from an incident recorded by our security cameras, your images could be communicated to the Public Order Forces, State Security Bodies and judicial authorities, by virtue of the provisions of the Law.

Likewise, your personal information will be available to the Public Administrations, Judges and Courts, for the attention of possible responsibilities arising from the treatment.

## **International data transfers**

We make international transfers of your data to our Headquarters located in Taipei Taiwan to continue with the services offered and as a contingency site.

We have agreed with our suppliers that, for the provision of the contracted service, they

make use of servers located in the Republic of Panama and if, in the future, we need to make use of servers located outside the territory of the Republic of Panama, the measures will be adopted appropriate, which will be incorporated into this Privacy Policy, guaranteeing that said providers are under the Privacy Shield agreement, the General Data Protection Regulation of the European Community or that there are other adequate guarantees.

### **What are your rights in relation to the processing of your data and how can you exercise them?**

The data protection regulations allow you to exercise your rights of access, rectification, cancellation, opposition and data portability, as well as not being subject to decisions based solely on the automated processing of your data, when appropriate.

These rights are characterized by the following:

Its exercise is free, except in the case of manifestly unfounded or excessive requests (for example: of a repetitive nature), in which case Mega ICBC may charge a fee proportional to the administrative costs borne or refuse to act:

- You can exercise your rights directly or through your legal representative or volunteer
- We must respond to your request within the term stipulated by Law 81, although, if the complexity and number of requests are taken into account, the term may be extended by double the number of days stipulated by Law 81 and its regulations.
- We have the obligation to inform you about the means to exercise these rights, which must be accessible and without being able to deny you the exercise of the right for the sole reason of opting for another means. If the request is submitted by electronic means, the information will be provided by electronic means when possible, unless you request otherwise.
- If Mega ICBC does not process the request, it will inform you, no later than five (5) days, of the reasons for not acting and the possibility of claiming before the Superintendency of Banks of Panama and the National Authority for Transparency and Access to information.

To exercise your rights, Mega ICBC makes the following means available to you:

1. By written and signed request addressed to Mega International Commercial Bank Co. Ltd. at Ave. Balboa, Torre Davivienda, Floor 9, Local A-B. Regarding the Exercise of Rights ARCO Law 81.
2. Sending the "ARCOP Rights Request Form" with signature and supporting documentation to the email address [protecciondp\\_pnm@megaicbc.com](mailto:protecciondp_pnm@megaicbc.com) indicating in the subject Exercise of ARCO Law 81 Rights.

In both cases, you must attach your photocopy of your identity document or, where appropriate, a scanned copy, or an equivalent document in order to verify that we only respond to the interested party or their legal representative, and in this case provide a document accrediting the representation.

Likewise, and especially if you consider that you have not obtained full satisfaction in the exercise of your rights, we inform you that you may file a claim with the national control authority by contacting the Superintendency of Banks of Panama and the National Authority for Transparency and Access to Information (NATAI).

### **How do we protect your information?**

At Mega ICBC we are committed to protecting your personal information.

We use reasonably reliable and effective measures, controls and procedures of a physical, organizational and technological nature, aimed at preserving the integrity and security of your data and guaranteeing your privacy.

In addition, all personnel with access to personal data have been trained and are aware of their obligations in relation to the processing of their personal data.

In the case of the contracts that we sign with our suppliers, we include clauses in which they are required to maintain the duty of secrecy regarding the personal data to which they have had access by virtue of the order carried out, as well as to implement security measures. technical and organizational techniques necessary to guarantee the confidentiality, integrity, availability and permanent resilience of the systems and services for the processing of personal data.

All these security measures are reviewed periodically to ensure their adequacy and effectiveness.

However, absolute security cannot be guaranteed and there is no security system that is impenetrable, therefore, in the event that any information subject to processing and under our control is compromised as a result of a security breach, we will take the adequate measures to investigate the incident, notify the Superintendence of Banks of Panama and NATAI and, where appropriate, to those users who may have been affected so that they take the appropriate measures.