

ALUMNI NETWORK WEBSITE DATA PROTECTION NOTICE

Effective: December 1, 2023

Last Update: November 2023

[Chinese Version](#)**I. INTRODUCTION**

Thank you for making a connection and requesting to join our Alumni Network Website.

This Alumni Network Website Data Protection Notice (“Notice”) has been prepared to outline how Bank of America N.A., and each other affiliate or subsidiary (“affiliate”) of Bank of America Corporation (collectively, “the Company”, “we”, “us”, or “our”) collect, use, store, transfer and otherwise process individually identifiable information about Alumni (“**Personal Data**”) who visit or use the Bank of America Alumni Network Website. For the purposes of this Notice, “**Alumni**” means any individual who is a former employee of the Company who has retired or left in good standing as determined by us and limited to use of this site. The Company may also provide to Alumni additional data protection or privacy notices from time to time.

California residents covered by the California Consumer Privacy Act may have additional rights. To learn more, California residents can reference the [California Consumer Privacy Act Notice](#) for additional information.

In the event this Notice is provided to an Alumni in a language other than English, any discrepancy, conflict or inconsistency between the two language versions shall be resolved in favor of the English version, subject to applicable law.

[Chinese Version](#)**II. PERSONAL DATA COLLECTION AND PURPOSES OF USE**

Participation in the Alumni Network Website requires the Company to collect Personal Data that is directly relevant to its business, required to meet its legal obligations, or otherwise permissible to collect under applicable law. Listed in [Appendix A](#) of this Notice are the categories of Personal Data that we collect and the purposes for which we use the data that we collect, except where restricted by applicable law. We receive Personal Data from you and from other sources, including public sources. To join the Network, you must first acknowledge the Data Protection Notice by checking the confirmation box when creating your account. Checking this box indicates that you are providing consent to your information to be displayed and shared, and for the program to use your contact information.

We collect and process Personal Data about you: (i) because we are required or permitted to do so by applicable law, (ii) because such information is necessary for membership of the Alumni Network, (iii) because such information is of particular importance to us and we have a specific legitimate interest under law to process it, (iv) where the Personal Data is necessary for the establishment, exercise or defense of legal claims, or (v) where necessary, we obtain consent of Alumni for collection and processing of Personal Data

If you do not provide certain categories of Personal Data, the Company may not be able to accomplish some of the purposes outlined in this Notice and we may not be able to grant you membership.

III. COOKIES AND TRACKING TECHNOLOGY

Non-essential and essential cookies are collected on some websites and mobile applications that the Company uses. Please refer to the following [policy](#).

This site may leverage technology to collect information on where Alumni are located, which in turn may be used to present job openings, volunteer activities and other opportunities to participate in the Alumni Network. See Section VI for information on how you can delete your personal data.

Industry standards continue to evolve around web browser "do not track" signals or configurations set in your internet browser. Bank of America captures opt out preference signals, and to the extent users have rights under applicable law, treats them as valid requests to opt out of sale/sharing at the browser level.

We may use third-party providers to process personal information for business purposes on our behalf. Third-party providers are contractually obligated to comply with our policies to protect information we share with them or they collect on our behalf.

IV. DISCLOSURE

To the extent permitted by applicable law and as appropriate to achieve the purposes described in this Notice, Personal Data may be disclosed by the Company as follows:

Given the global nature of the Company's activities, the Company may (subject to applicable law) transmit Personal Data, to other Bank of America affiliates or operations located in other jurisdictions, including the United States or other jurisdictions where data protection laws may not provide an equivalent level of protection to the laws in the Alumni's home jurisdiction. The affiliates belonging to the Bank of America Corporation group are listed at the link below. The listing is available upon request.

The Company may disclose in accordance with applicable law relevant Personal Data to certain third parties in connection with the provision of services to the Company. Where the processing of Personal Data is delegated to a third party data processor, such as those listed in [Appendix A](#), the Company will delegate such processing in writing, will choose a data processor that provides sufficient guarantees with respect to technical and organizational security measures, such as data protection and information security requirements, governing the relevant processing and will ensure that the processor acts on the Company's behalf and under the Company's instructions.

Personal Data also may be disclosed, where permitted by applicable law, in connection with a corporate restructuring, sale, or assignment of assets, merger, divestiture, or other changes of the financial status of the Company or any of its subsidiary or affiliated companies. Personal Data also may be released, to protect the legitimate interests of the Company (unless this would prejudice the rights and freedoms or interests of the Alumni), or in the Company's judgement to comply with applicable legal or regulatory obligations and regulatory inquiries or requests subject to local law with respect of China.

V. SECURITY

The Company maintains appropriate technical and organizational measures designed to protect against unauthorised or unlawful processing of Personal Data and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage to Personal Data.

VI. ACCESS, PORTABILITY, RECTIFICATION AND SUPPRESSION, LIMITATION AND RESTRICTION OF PROCESSING AND ACCURACY OF PERSONAL DATA

Alumni are entitled to access Personal Data held about them (with the exception of any documents that are subject to legal privilege, that provide Personal Data about other Alumni, or that otherwise are not subject to data subject access rights). Any Alumni who wishes to access his/her Personal Data or (where permitted under applicable law) request portability of their data should contact a member of the Alumni Network Program Office using the contact information set out in Section IX below.

To the extent required by applicable law, Alumni have the right to have inaccurate data corrected or removed (at no charge to the Alumni and at any time) or to limit or restrict processing of their data.

To assist the Company in maintaining accurate Personal Data, Alumni must ensure they keep their Personal Data up to date on the Company's Alumni portal. In the event that the Company becomes aware of any inaccuracy in the Personal Data it has recorded, it will correct that inaccuracy at the earliest practical opportunity.

To the extent available under applicable law, Alumni may also have the following rights (including but not limited to):

- to request a copy of Personal Data held by the Company (as part of an access request above);
- to request further information or complain about the Company's practices and processes regarding their Personal Data;
- to object to, withdraw consent to, restrict, or request discontinuance of collection, use, disclosure and other processing of their Personal Data as described in this Notice and to request deletion of such Personal Data by the Company.

For all inquiries, Alumni should contact a member of the Alumni Network Program Office using the contact information set out in Section IX below. Under applicable law, in certain circumstances, the Company may be exempt from or entitled to refuse the above requests or rights. Certain additional terms and conditions may be applicable to process requests or rights, such as requiring communications to be in writing or requiring proof of identity.

VII. MODALITIES OF THE PROCESSING AND DATA RETENTION

The Company does not use automated decision making on Alumni processes. 'Automated decision-making' is the process of making a decision by automated means without any human involvement.

Collection, use, disclosure, transfer and other processing, including storage, of Personal Data may be by electronic or manual means, including by hard-copy or soft-copy documents or other appropriate technology. Personal Data may be stored in an Alumni's home jurisdiction and/or other jurisdictions in which the Company has operations.

The Company will maintain Personal Data for as long as it is required to do so by applicable law(s) or for as long as necessary for the purpose(s) of use and processing in Section II, whichever is longer ("the retention period"). Any maximum storage term set forth by applicable law will prevail. The Company will delete Personal Data after the applicable retention period. The retention periods for each type of data and jurisdiction are outlined on the Global Records Retention Schedule, available upon request.

The criteria used to determine our retention periods include:

- As long as we have an ongoing relationship with the Alumni;
- As required by a legal obligation to which we are subject;
- As advisable in light of our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations);
- The time period necessary to achieve the purpose of use and processing.

VIII. QUESTIONS

Should any Alumni have any questions, concerns or complaints about this Notice, please contact the Alumni Program via email: alumni.network@bofa.com.

In certain countries, if you have additional queries about the way in which the Company processes your Personal Data more broadly you may contact the local Data Protection Officer using the following contact details:

EMEA Region and Canada: DPO@bofa.com

Switzerland: DPO@bofa.com

[Nicole Busslinger-Roch](#)

STOCKERHOF

STOCKERSTRASSE 23

ZURICH, 8002 Switzerland

Brazil: DPO@bofa.com

APAC Region: DPO@bofa.com

Alumni may have the right to lodge a complaint with the local Data Protection authority.

IX. CHANGES TO THIS NOTICE

Should the Company substantially modify the manner in which it collects or uses Personal Data, the type of Personal Data it collects or any other aspect of this Notice, it will notify Alumni as soon as reasonably possible by reissuing a revised Notice or taking other steps in accordance with applicable laws including obtaining Alumni consent where required.

X. JURISDICTION-SPECIFIC CLAUSES

AUSTRALIA

All reasonable steps are taken to ensure security, privacy and integrity of any Personal Data transferred to recipients outside Australia. However, the Company must rely on your consent to transfer Personal Data to unaffiliated third-party recipients outside Australia. You acknowledge that, prior to your consent to transfers of Personal Data to unaffiliated third party recipients outside Australia (other than service providers), the Company has expressly informed you that it is a consequence of such consent

that, if any such overseas recipient handles the Personal Data in breach of the Privacy Act 1988 (Cth) (“Privacy Act”), the Company is not accountable under the Privacy Act and you may not be able to seek redress under the Privacy Act or in the overseas jurisdiction.

BRAZIL

The Lei Geral de Proteção de Dados Pessoais (LGPD) has implemented new rights in addition to those listed in Section VII:

- to receive information about the consequences of denying consent;
- to request anonymization, blocking, or deletion of unnecessary or excessive personal data;
- to request information about entities with which the company has shared personal data; and
- to request review, by a natural person, of decisions taken solely on the bases of automated processing of personal data that affects the Alumni’s interests.

Under applicable law, in certain circumstances, the Company may be exempt from or entitled to refuse the above requests or rights. Certain additional terms and conditions may be applicable to process requests or rights, such as requiring communications to be in writing or requiring proof of identity.

PEOPLE’S REPUBLIC OF CHINA (“China”, which, as a jurisdiction for the purpose of this Notice, excludes the jurisdictions of Hong Kong Special Administrative Region, the Macau Special Administrative Region and Taiwan)

Please see [Appendix B](#) for a list of the organizations to whom we transfer Personal Data as data controllers in China (which can independently determine processing purposes and processing methods in Personal Data processing activities) and other receiving parties outside of China, and their respective contact details and details on what, how and why such organizations process your Personal Data and, where required, how you can exercise your data privacy rights in respect of those organizations. If you want to exercise your rights related to the protection of Personal Data to the overseas recipients, you can submit your requests through the contact information provided in the “Questions” section of this Notice. After we transfer your Personal Data outside of China, the data controller outside China may also provide some of your exported Personal Data to our affiliated entities or third-party service providers that are entrusted to provide relevant services such as software and hosting services and benefits and insurance administration and management or allow them to access the Personal Data within the necessity of providing such services.

Where required or permitted by applicable law, we may process Sensitive Personal Data for employment purposes in a manner that reasonably considers and mitigates, where practicable, negative impacts to your rights and interests.

In accordance with the National Administration for Financial Regulation (NFRA) Shanghai regulations, banks and insurance companies operating in Shanghai are required to disclose to NFRA Shanghai certain employee hiring and termination information, including employment status, job movements and disciplinary records, during your employment with the Company. Such information is recorded in the NFRA Shanghai’s system and is accessible by other banks and insurance companies for reference check purposes.

EEA / UK / Switzerland

Given the global nature of the Company's activities, the Company may transfer your Personal Data to countries located outside of the European Economic Area ("EEA"), the UK or Switzerland. With regards to transfers from the EEA, UK or Switzerland to other countries, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your information. Where necessary we added the UK SCC addendum (for transfers from UK) and/or additional clauses for Switzerland (for transfers from Switzerland). Alumni in the EEA, UK or Switzerland may obtain a copy of these measures by going to https://commission.europa.eu/law/law-topic/data-protection_en

Where countries are considered adequate by the EU, UK and Switzerland respectively, we rely on this adequacy decision as a safeguard. Countries that are subject to an adequacy decision can be found on the links below.

For the EEA: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

For the UK: <https://www.gov.uk/government/publications/uk-approach-to-international-data-transfers/international-data-transfers-building-trust-delivering-growth-and-firing-up-innovation>

For Switzerland:

https://www.edoeb.admin.ch/edoeb/en/home/datenschutz/arbeit_wirtschaft/datenuebermittlung_ausland.html

Individuals may also file a complaint with a supervisory authority competent for their relevant country or region. A list of data protection authorities in the EEA is available at: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080. The data protection authority in the UK is the Information Commissioners Office (the ICO) and in Switzerland it's the Federal Data Protection and Information Commissioner (FDPIC).

FRANCE

Under French law, in addition to the above, Alumni shall have the right to set guidelines regarding the retention, erasure and disclosure of their Personal Data after their death.

PHILIPPINES AND SINGAPORE

To the extent required by applicable law, certain authorized individuals may exercise the rights mentioned in Section VII on behalf of a deceased Alumni. In furtherance of data protection and security, the Company may apply additional terms and conditions to process requests or rights made by individuals other than the deceased Alumni, such as requiring proof of legal authority to validly act on behalf of the deceased Alumni. Authorized individuals that seek to exercise these rights may contact a member of the Alumni Program using the contact information set out in Section IX.

SOUTH AFRICA

Where Personal Data is transferred by the Company outside of South Africa, the Company will address any applicable requirement to assure an adequate level of data protection before transferring Personal Data by assuring the implementation of binding corporate rules or the execution of appropriate data transfer agreements conforming to the European Union Standard Contractual Clauses. In terms of POPIA, Alumni are entitled to approach the South African courts and can lodge a complaint with South

Africa’s information regulator in respect of any alleged interference with the protection of their Personal Data. The contact details of South Africa’s information regulator are as follows:

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Email address: complaints.IR@justice.gov.za

SWITZERLAND

Categories of third parties	Personal Data	Purpose of processing your Personal Data	Destination Countries
Service Providers Event Vendors	Personal Details: Name*, Profile Photo, Current Location*, Postal Address, State* Professional Details: Employment Status*, Current Company* and Industry Contact Information: Email Address*, LinkedIn Profile, Phone Number	For use in planning events and communicating with members of the Bank of America Alumni network	United States

TAIWAN

See [Annexures 1 and 2](#) for a list of the relevant standard purposes of use and types of personal data as prescribed by the Ministry of Justice.

TURKEY

As per Article 11 of the Data Protection Law (Law No. 6698) your rights regarding protection of your personal data are as follows:

- To know whether or not personal data is processed
- To request information if personal data is processed
- To know the purpose of processing personal data and whether or not the data is being processed in accordance with these purposes
- To know of any third parties where personal data is transferred to within Turkey or abroad, to request correction of personal data if it is incomplete or inaccurately processed, and to request notification of such correction if the personal data is being transferred
- To request the deletion or destruction of the personal data in case the legal ground or reasons requiring the processing of the data is no longer existed and to request notification of such deletion or destruction if the personal data is being transferred
- To object to negative results occurred through a fully automated processing of personal data
- To request compensation in case of loss due to unlawful processing of personal data.

For your request regarding usage of your rights mentioned above in connection with your personal data, please contact the Company, please refer to Section IX for details, or deliver by hand or by a notary public with your identification documents with original signature. Your request will be finalized as soon as possible at the latest within 30 (thirty) days after the receipt of the relevant documents. If your application is rejected, you can apply to the Personal Data Protection Board within 30 days and at the latest 60 days in accordance with the Article 14 of the Data Protection Law (Law No. 6698).

UNITED ARAB EMIRATES

International Transfers of Personal Data

With regards to transfers from the DIFC to other countries, we have put in place suitable safeguards, such as standard contractual clauses, adopted by the DIFC to protect your information. Alumni in the DIFC may obtain a copy of these measures by following these links:

<https://www.difc.ae/business/operating/data-protection/adequate-data-protection-regimes/>

Consent of the Notice

I have read the “Alumni Network Data Protection Notice” describing the collection, processing and use of my Personal Data by the Company, and the international transfer of my Personal Data (including to jurisdictions where data protection laws may not provide an equivalent level of protection to the laws of my home jurisdiction) during the course of enrolment into the network. By voluntarily submitting my Personal Data, I explicitly consent to the processing as set out in this Notice.

Appendix A

The table below contains the purpose for which we may process your personal data, the types of processing activities that may take place and the category of personal information that would be used for such processing as well as the legal basis for the processing. More information is listed below the table about the personal information categories.

Purpose	Examples of Processing Activities	Personal Information Categories	Legal Basis
Alumni Network	<ul style="list-style-type: none"> To process registration and provide verification of Alumni accounts and related customer service To facilitate participation in the Alumni Network program To enable recruiting activities and talent management To communicate regarding Bank of America news, invitations to special events, volunteer activities and various Alumni benefits To provide offers related to Bank of America products, financial services, and benefits To send messages from the Alumni Network team To enable voluntary connections, social and networking communications between Alumni To facilitate data analytics and research regarding the effectiveness of our Alumni program and related activities To accomplish other business purposes of 	<ul style="list-style-type: none"> Personal Details: Name*, Profile Photo, Current Location*, Postal Address, State* Professional Details: Employment Status*, Current Company* and Industry Contact Information: Email Address*, LinkedIn Profile, Phone Number Career at Bank of America: Year Started*, Year Left*, Most recent Line of Business*, Most recent Position/Job Title, Bank of America Office city*, Name of recent manager Optional Questions: Bank of America Standard ID (NBK ID), Bank of America Person Number, Interest in Employee Groups/Networks, Interest in Community Service Areas 	<p>Consent</p> <ul style="list-style-type: none"> To obtain consent to use data for registration into the Alumni Network <p>Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.</p>

	Bank of America and its Alumni Network <ul style="list-style-type: none"> • To monitor for fraud and security purposes, and prevent cyberattacks • To comply with legal and regulatory obligations 		
--	--	--	--

*Personal Data marked with an asterisk in this Section is mandatory for Alumni to provide to the Company. It is voluntary for Alumni to provide other types of Personal Data and information about themselves. Some of the personal data listed above may be shared, collected, used, transferred and/or disclosed in-line with country specific laws/regulations.

The Categories Of Unaffiliated Third Parties With Whom We May Share Personal Data

Categories of third parties	Personal Data	Purpose of processing your Personal Data	Destination Countries
Event Vendors:	Personal Details: Name*, Profile Photo, Current Location*, Postal Address, State* Professional Details: Employment Status*, Current Company* and Industry Contact Information: Email Address*, LinkedIn Profile, Phone Number	For use in planning events and communicating with members of the Bank of Alumni network	Globally where we have presence Bank of America Locations

Annexure 1

Relevant Standard Purposes for Personal Data Protection Act as prescribed by Ministry of

Justice

Code	Purpose Type	目的項目
(001)	personal insurance	人身保險
(002)	human resources management	人事管理
(003)	arrival, departure and immigration	入出國及移民
(031)	national health insurance, labor insurance, farmers insurance, national pension insurance or other social insurances	全民健康保險、勞工保險、農民保險、國民年金保險或其他社會保險
(059)	the collection, process and use by financial service enterprises according laws and regulations and for the need of financial supervision	金融服務業依法令規定及金融監理需要，所為之蒐集處理及利用
(060)	financial dispute resolution	金融爭議處理
(061)	financial supervision, management and	金融監督、管理與檢查
(063)	the collection, process and use of personal information by non-government agency for fulfillment of regulatory obligations	非公務機關依法定義務所進行個人資料之蒐集處理及利用
(064)	health and medical services	保健醫療服務
(069)	contractual, quasi-contractual or other legal relationship affairs	契約、類似契約或其他法律關係事務
(090)	consumer and customer management and services	消費者、客戶管理與服務
(104)	billing management and credit transaction business	帳務管理及債權交易業務

(114)	labor administration	勞工行政
(120)	tax administration	稅務行政
(129)	accounting and relevant services	會計與相關服務
(136)	information (tele-) communication and database management	資（通）訊與資料庫管理
(137)	information (tele-) communication security and management	資通安全與管理
(150)	auxiliary and back-office supporting management	輔助性與後勤支援管理
(154)	credit checks	徵信
(157)	investigation, statistics and research analysis	調查、統計與研究分析

(166)	securities, futures, securities investment	證券、期貨、證券投資信託及顧問相關業務
(168)	passport, visa, and verification documents	護照、簽證及文件證明處理
(173)	the supervision and management of target	其他公務機關對目的事業之監督管理
(177)	other financial management business	其他金融管理業務
(181)	other business conducted under the business registration items or organizational articles of	其他經營合於營業登記項目或組織章程所定之業務
(182)	other advisory and consulting services	其他諮詢與顧問服務

Annexure 2

Relevant Data Types for Personal Data Protection Act as prescribed by Ministry of Justice

Code	Data Type	資料項目
1. Identification category 識別類		
(C001)	for identification of individual	辨識個人者
(C002)	for identification of finance	辨識財務者
(C003)	for identification in government	政府資料中之辨識者
2. Characteristic category 特徵類		
(C011)	individual description	個人描述
(C012)	description of bodies	身體描述
(C014)	characteristic – the comment or opinion on characteristic, etc	個性 - 例如:個性等之評述意見
3. Household status 家庭情形		
(C021)	household status	家庭情形
(C023)	details of other members in the family	家庭其他成員之細節
(C024)	other social relations – friend, colleague and other non-family relationship etc	其他社會關係 - 例如:朋友、同事及其他除家庭以外之關係等
4. Social status 社會情況		
(C031)	residence and facilities	住家及設施
(C032)	properties	財產
(C033)	immigration status	移民情形
(C034)	travel and other transportation details	旅行及其他遷徙細節
(C035)	recreational activities and interests – the hobbies, sports and other entertainments, etc	休閒活動及興趣 - 例如:嗜好、運動及其他興趣等
(C038)	occupation	職業
5. Education, examination and election, techniques or other professions 教育、考選、技術或		
(C051)	academic records	學校紀錄
(C052)	qualification or techniques	資格或技術
(C053)	occupational group member qualification	職業團體會員資格
(C054)	occupational expertise	職業專長
(C057)	record of students (members) and examination takers	學生 (員)、應考人紀錄
6. Employment status 受僱情形		
(C061)	current employment status	現行之受僱情形
(C062)	employment history	僱用經過
(C063)	jobs leaving history	離職經過
(C064)	work experiences	工作經驗

(C065)	work, travel and attendance records	工作、差勤紀錄
--------	-------------------------------------	---------

Appendix B

Organizations To Which We May Disclose Personal Data

Overseas Recipient			
Name	Contact Information	Processing Purpose and Method	Category of Personal Data
EnterpriseJungle dba Enterprise Alumni	Owen Geddes, COO Enterprise Alumni owen.geddes@enterprisealumni.com	Vendor platform uses data to provide metrics and reporting back to Bank of America to administer the Bank of America Alumni Network program. Bank of America Corporation may receive, store, process, and delete the data of China employees in accordance with this Notice to the extent necessary for alumni program management and will not use the data for other purposes not stated within this Notice.	Alumni – Former Employee Required Fields <ul style="list-style-type: none"> • First and last name • Current city of residence • Current state of residence • Current employment status • Current company • Years employed at Bank of America • Most recent line of business • Most recent bank office location Optional Fields <ul style="list-style-type: none"> • Mailing address • Phone number • Country of residence indicator • Employee ID and Person number • Interest in employee groups • Interest in community service • Personal profile photo • Board memberships and roles • Education information • Skills & certifications • Languages spoken • Current employment industry • Name of most recent manager • Personal contact information • Social media handles
Bank of America Corporation	Human Resources, Bank of America Alumni Network via alumni.network@bofa.com	Alumni program management, including validation of membership eligibility, program metrics, access to alumni benefit programs, and to carry out daily business and office work. Bank of America Corporation may receive, store, process, and delete the data of China employees in accordance with this Notice to the extent necessary for alumni program management and will not use the data for other purposes not stated within this Notice.	Alumni – Former Employee Required Fields <ul style="list-style-type: none"> • First and last name • City of current residence • Current employment status • current company • Years employed at Bank of America • Most recent line of business • Most recent bank office location Optional Fields <ul style="list-style-type: none"> • Mailing address • Phone number • Country of residence indicator • Employee ID and Person number • Interest in employee groups • Interest in community service • Personal profile photo • Board memberships and roles • Education information • Skills & certifications

			<ul style="list-style-type: none">• Languages spoken• Current employment industry• Name of most recent manager• Personal contact information• Social media handles
--	--	--	--

校友会网站数据保护通知

生效日期：2023年12月1日

最近更新日期：2023 年 11 月

一、简介

感谢您与我们联系并请求加入我们的校友会网站。

本校友会网站数据保护通知（“**本通知**”）旨在概述美国银行及美国银行有限公司其他各关联公司或子公司（“**关联公司**”）（统称为“**本公司**”、“**我们**”或“**我们的**”）如何收集、使用、存储、传输及以其他方式处理访问或使用美国银行校友会网站的校友的个人可识别信息（“**个人数据**”）。就本通知而言且仅限于使用本网站时，“**校友**”是指被我们确定为信誉良好的任何本公司退休或离职人员。本公司也可能不定期向校友提供其他数据保护或隐私通知。

受《加利福尼亚州消费者隐私法案》保护的加利福尼亚州居民可能还享有其他权利。欲了解更多信息，加利福尼亚州居民可查阅[《加利福尼亚州消费者隐私法案通知》](#)，来获取更多信息。

若本通知以英文以外的其他语言提供给校友，那么两种语言版本之间的任何差异、冲突或不一致应以支持英文版本的方式予以解决（除非适用法律另有规定）。

二、个人数据收集和使用目的

为建立校友会网站，本公司需要收集同其业务直接相关的、履行其法律义务所需的或适用法律另作规定允许收集的个人信息。本通知[附录 A](#)中所列是我们收集的个人信息类别以及我们使用所收集的数据的目的（适用法律限制的除外）。我们从您以及其他来源收取个人信息，包括公共来源。创建帐户加入校友会时您必须首先勾选确认框，确认已收到数据保护通知。勾选此框表示您同意显示和共享您的信息，也允许本计划使用您的联系信息。

我们收集和与您有关的个人信息：(i) 因为当地适用法律要求或允许我们这样做，(ii) 因为您加入校友会需要提供这些信息，(iii) 这些信息对我们尤为重要，且我们依据适用法律有明确的合法权益依法处理这些信息，(iv) 确立、行使或辩护法律主张需要这些个人信息，(v) 必要时，我们对个人信息的收集和处理已取得校友的同意。

如果您不提供某些类别的个人信息，本公司可能无法实现本通知中列明的某些目的，因而无法授予您会员身份。

三、COOKIES 和跟踪技术

会在本公司使用的某些网站和移动应用程序上收集非必要 cookies 和必要 cookies。请参考以下[政策](#)。

本网站可能利用技术收集校友的所在地信息，这些信息反过来可能用于提供职位空缺、志愿者活动和其他参与校友会的机会。有关如何删除您的个人信息，请参见第六节。

在网络浏览器“不跟踪”标识或您的互联网浏览器配置方面，行业标准在不断发展。美国银行会捕捉选择退出的偏好标识，在用户依适用法律所享有的权利范围内，将此类标识视为浏览器级别上的有效退出销售/共享请求。

我们可能会委托第三方提供商代表我们就业务目的处理个人信息。第三方提供商根据合同有义务依照我们的政策来保护我们与其共享或其代表我们收集的信息。

四、披露

在适用法律允许的范围内以及为适当实现本通知中所述的目的，本公司可能在下列情况下披露个人数据：

鉴于本公司活动的全球性，本公司可（根据适用法律）将个人数据传输至其他司法管辖区内的其他美国银行关联企业或营业地，包括美国或数据保护法律提供的法律保护程度可能不同于校友原属司法管辖区适用法律保护程度的其他司法管辖区。下面的链接列出了美国银行有限公司集团的关联企业。该列表一经要求即可提供。

本公司可依据适用法律，向为本公司提供服务的特定第三方披露相关个人数据。若委托第三方数据处理商处理个人数据，比如[附录 A](#)中所列的数据处理商，本公司将以书面形式对有关处理进行委托，选择就管理相关处理的技术和组织安全措施（比如数据保护和信息安全要求）提供足够保证的数据处理商，并确保该处理商代表本公司行事并遵从本公司指示。

在适用法律允许的情况下，出于本公司或其任何子公司或关联企业的公司重组、出售或资产转让、合并、撤资或其他财务状况变更的有关事宜，也可予以披露个人数据。出于保护本公司合法权益（此行为会侵害校友权利和自由或利益时除外）的目的，或依本公司判断为遵守适用法律或法规义务和监管的调查或要求（以中国地方法律为准），可发布个人数据。

五、安全性

本公司维持适当的技术和组织措施，以防止未经授权或非法处理个人数据，和/或防止个人数据意外丢失、篡改、披露或访问、意外或非法销毁或破坏。

六、个人数据的访问、可移植性、纠正和抑制、处理限制和约束以及准确性

校友有权访问本公司持有的有关其本人的个人数据（享有法定保密特权的文件、提供其他校友的个人数据的文件或其他不属于数据当事人访问权限的文件除外）。任一校友若想访问其本人的个人数据或（适用法律允许的情况下）请求移植其数据，应联系校友会计划办公室的人员，联系信息见下述第九节。

在适用法律要求的范围内，校友有权更正或删除不准确的数据（任何时候均可，不向校友收取任何费用）或者限制或约束其数据的处理。

为了帮助本公司维护准确的个人数据，校友必须确保其在本公司校友门户网站中记录的个人数据及时更新。若本公司发现其记录的个人数据有任何不准确之处，将于实际可行的最早时间内进行更正。

在适用法律允许的范围内，校友也可以享有以下权利（包括但不限于）：

- 索取本公司持有的个人数据副本（作为上述访问要求的一部分）；
- 要求取得与本公司就其个人数据采取的惯例和流程有关的进一步信息或就此类惯例和流程请求投诉；
- 反对、撤销同意、限制或要求中止本通知中所述的其个人数据的收集、使用、披露以及其他处理，以及要求本公司删除有关个人数据。

查询任何信息时，校友应通过下文第九节所述的联系信息联系校友会计划办公室的成员。根据适用法律，在若干情况下，本公司可免除或有权拒绝上述要求或权利。某些其他条款和条件可能适用于处理要求或权利，比如要求以书面方式通讯或要求提供身份证明。

七、处理形式和数据保留

本公司对校友流程不采取自动化决策。“自动化决策”是在没有人干预的情况下通过自动化的方法进行决策的流程。

个人数据的收集、使用、披露、传输以及其他处理（包括存储）可能以电子或手动方式进行，其中包括通过纸质或电子文件或其他适当技术进行。个人数据可能存储在校友的原属司法管辖区和/或本公司经营业务所在的其他司法管辖区。

本公司将按照适用法律要求的保留期限或第二节中所述的使用和处理目的所需的期限（二者中较长者）（“**保留期限**”）保留个人数据。保留期限将以适用法律规定的最长存储期限为准。本公司将在适用保留期限结束后删除个人数据。每种数据和司法管辖区的保留期限在全球记录保留计划中列明，一经申请即可查看。

用于决定保留期限的标准包括：

- 只要我们与校友继续保持关系；
- 我们需要履行的法律责任需要；
- 根据我们的法律立场（比如就适用的法定时效、诉讼或监管调查而言）适当合理；
- 实现使用和处理目的必要的时限。

八、问题

如果任何校友对本通知有任何疑问、疑虑或投诉，请发送电子邮件至 alumni.network@bofa.com 联系校友计划部门。

在某些国家，如果您对本公司更广泛地处理您个人数据的方式有其他疑问，请使用以下联系方式与当地数据保护官联系：

EMEA 地区和加拿大： DPO@bofa.com

瑞士： DPO@bofa.com

[Nicole Busslinger-Roch](mailto:Nicole.Busslinger-Roch@bofa.com)

STOCKERHOF

STOCKERSTRASSE 23

ZURICH, 8002 Switzerland

巴西：DPO@bofa.com

亚太地区：DPO@bofa.com

校友有权向当地的数据保护机构提出投诉。

九、本通知的变更

若本公司要实质性地修改其收集或使用个人数据的方式、其收集的 personal 数据的类型或本通知的任何其他方面，将尽快通知校友，重新发出修订后的通知或依据适用法律采取其他措施，包括在需要时取得校友同意。

十、司法管辖区特定条款

澳大利亚

本公司采取一切合理措施，以确保传输给澳大利亚境外接收方的任何个人数据的安全性、私密性和完整性。但是，本公司必须征得您的同意才能将个人数据传输给澳大利亚境外的非关联第三方接收方。您承认，在您同意向澳大利亚境外的非关联第三方接收方（服务提供商除外）传输个人数据之前，本公司已明确告知您有关同意的后果是如果海外接收方以违反《1988 年隐私法》

（联邦）（“《隐私法》”）的方式处理个人数据，本公司不会根据《隐私法》承担责任，并且您可能无法根据《隐私法》或在海外司法管辖区寻求补救。

巴西

除第七节所列权利外，《巴西通用数据保护法》（LGPD）还实施了新的权利：

- 接收有关拒绝同意之后果的信息；
- 请求匿名化、阻止或删除不必要的或多余的 personal 数据；
- 请求公司提供与其共享个人数据的实体的信息；以及
- 针对仅通过自动处理个人数据而做出的影响校友利益的决定，要求交由自然人进行审查。

根据适用法律，在若干情况下，本公司可免除或有权拒绝上述要求或权利。某些其他条款和条件可能适用于处理要求或权利，比如要求以书面方式通讯或要求提供身份证明。

中华人民共和国（“中国”，作为一个司法管辖区在本通知中使用，不包括香港特别行政区、澳门特别行政区和台湾司法管辖区）

请查看[附录 B](#) 列明的我们在中国以数据控制人身份向其传输个人数据的组织清单（我们可以在个人数据处理活动中独立地决定处理目的和处理方法）以及中国境外的其他接收方，以及它们各自的联系详情、关于该等组织处理您的个人数据的内容、方式和原因详情，以及在需要时您可以针对这些组织行使您的数据隐私权利的方式。如果您希望向境外接收方行使个人数据保护权利，可通过本通知“问题”条款中所述的联系信息提出申请。我们将您的个人数据传输至中国境外后，中国境外的数据控制者也可能将您部分出境个人数据提供给我们的关联方或受委托

提供例如软件、托管、福利及保险等相关服务的第三方服务提供商，或允许上述主体在提供此类服务的必要范围内访问个人数据。

在适用法律要求或允许的情况下，我们可以（在适用的情况下）以合理考虑并减轻对您的权利和利益造成负面影响的方式处理以雇佣为目的处理敏感个人数据。

根据国家金融监督管理局（NFRA）上海监管局的规定，在上海经营的银行和保险公司必须向 NFRA 上海监管局披露特定的员工雇用和离职信息，包括在公司任职期间的雇用状况、工作变动和纪律处分记录。此类信息记录在 NFRA 上海监管局的系统中，其他银行和保险公司在征信调查时可以访问此类信息。

欧洲经济区/英国/瑞士

鉴于本公司活动的全球性，本公司可能将您的个人数据传输到欧洲经济区（“EEA”）、英国或瑞士以外的国家/地区。对于从 EEA、英国或瑞士到其他国家/地区的传输，我们采取了充分的措施，比如欧盟委员会为保护您的信息所采纳的标准合同条款。必要处还添加了英国 SCC 附录（适用于从英国传输的情况）和/或适用于瑞士的附加条款（适用于从瑞士传输的情况）。EEA、英国或瑞士的校友可访问 https://commission.europa.eu/law/law-topic/data-protection_en 获取一份这些措施的副本

对于欧盟、英国和瑞士各自认为所采取措施已充分的国家，我们将这一充分决定作为一种保障。与这一充分决定相关的国家/地区可在以下链接中找到。

EEA: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

英国: <https://www.gov.uk/government/publications/uk-approach-to-international-data-transfers/international-data-transfers-building-trust-delivering-growth-and-firing-up-innovation>

瑞士:

https://www.edoeb.admin.ch/edoeb/en/home/datenschutz/arbeit_wirtschaft/dateneuernittlung_ausland.html

个人也可以向相关国家或地区的主管监管机构提出投诉。EEA 的数据保护机构名单载于：http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080。英国的数据保护机构是信息专员办公室（ICO），瑞士则是联邦数据保护和信息专员（FDPIC）。

法国

根据法国法律，除上述规定外，校友有权针对其去世后如何保留、删除和披露其个人数据制定一份指南。

菲律宾与新加坡

在适用法律要求的范围内，某些获得授权的个人可以代表已故校友行使第七条中所述的权利。为了进一步强化数据保护和安全性，本公司可将额外的条款和条件适用于处理已故校友以外的个人提出的请求或权利，例如要求提供有效代表已故校友的合法授权证明。寻求行使该等权利的授权个人可以使用第九条所述的联系信息联系校友计划的成员。

南非

如果本公司在南非以外地区传输您的个人数据，本公司将通过实施具有约束力的企业规则或签署与欧盟标准合同条款相符的适当数据传输协议的方式履行任何适用的要求，以确保在传输个人数据之前提供适当的数据保护水平。关于 POPIA，校友也有权就任何涉嫌妨碍保护个人数据的行为向南非法院及南非的信息监管机构提出投诉。南非信息监管机构的联系详情如下所示：

实际地址：JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

邮寄地址: P. O. Box 31533, Braamfontein, Johannesburg, 2017

电子邮箱地址: complaints.IR@justice.gov.za

瑞士

第三方类别	个人数据	处理您个人数据的目的	目的地国家
服务提供商 活动供应商	个人详细信息: 姓名*、个人资料照片、当前地址*、邮寄地址、州* 专业详细信息: 就业状况*、当前公司*和行业 联系信息: 电子邮件地址*、LinkedIn 个人资料、电话号码	用于策划活动以及与美国银行校友会成员沟通	美国

中国台湾

关于司法部规定的相关个人数据标准使用目的和类型列表, 请参阅[附件 1](#) 和[附件 2](#)。

土耳其

根据数据保护法 (第 6698 号法律) 第 11 条, 您在保护个人数据方面有如下权利:

- 了解个人数据是否被处理
- 请求提供是否个人数据已被处理的信息
- 了解处理个人数据的目的以及该数据是否是按照这些目的处理的
- 了解土耳其境内或境外接受个人数据的任何第三方的信息。个人数据不完整或处理不准确时要求更正。若个人数据正在传输, 则要求就此类更正发出通知
- 要求处理该数据的法律依据或理由不再存在时请求删除或销毁个人数据, 若个人数据正在传输, 则要求就此类删除或销毁发出通知
- 反对完全自动化处理个人数据后产生的负面结果
- 就非法处理个人数据而造成的损失索赔

如果您请求行使上述与您的个人数据相关的权利, 请与本公司联系, 详情请参阅第九节。您也可亲自或通过公证人提交请求 (但公证人需要一并提供您的带有亲笔签名的身份证明文件)。您的请求最迟将在收到相关文件后 30 (三十) 天内处理完毕。如果您的申请被拒绝, 您可以根据数据保护法 (第 6698 号法律) 第 14 条在 30 天内且最多不超过 60 天内向个人数据保护委员会提出申请。

阿拉伯联合酋长国

个人数据跨国传输

对于从迪拜国际金融中心到其他国家/地区的传输, 我们采取了适当的保护措施, 比如 迪拜国际金融中心为保护您的信息所采纳的标准合同条款。迪拜国际金融中心的校友可以通过以下链接获得一份这些措施的副本: <https://www.difc.ae/business/operating/data-protection/adequate-data-protection-regimes/>

关于本通知的同意

我已阅读“校友会网站数据保护通知”，该通知涵盖了本公司对于我个人数据的收集、处理和使用，以及在注册加入校友会的过程中将我的个人数据进行的国际传输（包括向数据保护法可能无法提供与我所在司法管辖区法律同等保护水平的司法管辖区进行传输）。我自愿提交我的个人数据，明确同意按本通知的规定对其进行处理。

附录 A

下表包含我们处理您个人数据的目的、可能进行的处理活动类型、可能用于此类处理活动中的个人信息类别，以及此类处理活动的法律依据。下表列出了有关个人信息类别的更多信息。

目的	处理活动示例	个人信息类别	法律依据
校友会	<ul style="list-style-type: none"> 进行注册以及对校友帐户和相关客户服务进行验证 为参加校友会计划提供便利 举办招聘活动，实现人才管理 宣传关于美国银行的新闻、特殊活动邀请、志愿者活动和各种校友福利 提供与美国银行产品、金融服务和福利相关的优惠 从校友会团队发送消息 促进校友之间的自发联络、社交和人脉沟通 为校友计划和相关活动的有效性数据分析与研究提供便利 实现美国银行及其校友会的其他业务目的 为诈骗防范和安全保障目的实施监控，预防网络攻击 履行法律和监管义务 	<ul style="list-style-type: none"> 个人详细信息： 姓名*、个人资料照片、当前地址*、邮寄地址、州* 专业详细信息： 就业状况*、当前公司*和行业 联系信息： 电子邮件地址*、LinkedIn 个人资料、电话号码 在美国银行的工作经历： 开始年份*、离职年份*、最近业务线*、最近职位/职衔、美国银行办事处城市*、最近经理姓名 其他问题： 美国银行标准 ID（NBK ID）、美国银行人员编号、感兴趣的员工团体/人际网络、感兴趣的社区服务区域 	同意 <ul style="list-style-type: none"> 获得使用数据以注册校友会的同意 撤销同意不会影响撤销前基于此同意所做操作的合法性。

*本部分标有星号的个人数据是校友必须向本公司提供的。校友可自愿提供与他们有关的其他类型的个人数据和信息。以上所列的部分个人数据，可能会按照国家/地区的特定法律/法规，予以分享、收集、使用、传输及/或披露。

我们可能与其分享个人数据的非关联第三方的类别

第三方类别	个人数据	处理您个人数据的目的	目的地国家
活动供应商：	个人详细信息： 姓名*、个人资料照片、当前地址*、邮寄地址、州* 专业详细信息： 就业状况*、当前公司*和行业 联系信息： 电子邮件地址*、Linkedin 个人资料、电话号码	用于策划活动以及与校友会的银行成员沟通	我们的全球分布 美国银行地点

附件 1

司法部规定的个人数据保护法相关标准使用目的

代码	目的项目	目的項目
(001)	人身保险	人身保險
(002)	人事管理	人事管理
(003)	入出国及移民	入出國及移民
(031)	全民健康保险、劳工保险、农民保险、国民年金保险或其他社会保险	全民健康保險、勞工保險、農民保險、國民年金保險 或其他社會保險
(059)	金融服务业依法令规定及金融监理需要，所为之搜集处理及利用	金融服務業依法令規定及金融監理需要，所為之蒐集 處理及利用
(060)	金融争议处理	金融爭議處理
(061)	金融监督、管理与检查	金融監督、管理與檢查
(063)	非公务机关依法定义务所进行个人资料之搜集处理及利用	非公務機關依法定義務所進行個人資料之蒐集處理及 利用
(064)	保健医疗服务	保健醫療服務

(069)	契约、类似契约或其他法律关系事务	契約、類似契約或其他法律關係事務
(090)	消费者、客户管理与服务	消費者、客戶管理與服務
(104)	帐务管理及债权交易业务	帳務管理及債權交易業務
(114)	劳工行政	勞工行政
(120)	税务行政	稅務行政
(129)	会计与相关服务	會計與相關服務
(136)	资（通）讯与资料库管理	資（通）訊與資料庫管理
(137)	资通安全与管理	資通安全與管理
(150)	辅助性与后勤支援管理	輔助性與後勤支援管理
(154)	征信	徵信
(157)	调查、统计与研究分析	調查、統計與研究分析

(166)	证券、期货、证券投资信托及顾问	證券、期貨、證券投資信託及顧問相關業務
(168)	护照、签证及文件证明处理	護照、簽證及文件證明處理

(173)	其他公务机关对目的事业之监督管理	其他公務機關對目的事業之監督管理
(177)	其他金融管理业务	其他金融管理業務
(181)	其他经营合于营业登记项目或组织章程所定之业务	其他經營合於營業登記項目或組織章程所定之業務
(182)	其他咨询与顾问服务	其他諮詢與顧問服務

附件 2

司法部规定的个人数据保护法相关数据类型

代码	资料项目	資料項目
1. 识别类 識別類		
(C001)	辨识个人者	辨識個人者
(C002)	辨识财务者	辨識財務者
(C003)	政府资料中之辨识者	政府資料中之辨識者
2. 特征类 特徵類		
(C011)	个人描述	個人描述
(C012)	身体描述	身體描述
(C014)	个性 - 例如：个性等之评述意见	個性 - 例如：個性等之評述意見
3. 家庭情形 家庭情形		
(C021)	家庭情形	家庭情形
(C023)	家庭其他成员之细节	家庭其他成員之細節
(C024)	其他社会关系 - 例如：朋友、同事及其他除家庭以外之关系等	其他社會關係 - 例如：朋友、同事及其他除家庭以外之關係等
4. 社会情况 社會情況		
(C031)	住家及设施	住家及設施
(C032)	财产	財產
(C033)	移民情况	移民情況
(C034)	旅行及其他迁徙细节	旅行及其他遷徙細節
(C035)	休闲活动及兴趣 - 例如：嗜好、运动及其他兴趣等	休閒活動及興趣 - 例如：嗜好、運動及其他興趣等
(C038)	职业	職業
5. 教育、考选、技术或其他专业 教育、考選、技術或其他專業		
(C051)	学校纪录	學校紀錄
(C052)	资格或技术	資格或技術
(C053)	职业团体会员资格	職業團體會員資格
(C054)	职业专长	職業專長
(C057)	学生（员）、应考人纪录	學生（員）、應考人紀錄
6. 受雇情形 受僱情形		
(C061)	现行之受雇情形	現行之受僱情形
(C062)	雇用经过	僱用經過
(C063)	离职经过	離職經過
(C064)	工作经验	工作經驗

(C065)	工作、差勤纪录	工作、差勤紀錄
--------	---------	---------

我们可能向其披露个人数据的组织

海外接收方			
姓名	联系信息	处理目的和方法	个人数据类别
EnterpriseJungledba 企业校友	Owen Geddes, 企业校友首席运营官, owen.geddes@enterprisealumni.com	<p>供应商平台使用数据向美国银行返回指标和报告, 以管理美国银行的校友会计划。</p> <p>美国银行可能在校友计划管理所需的范围内根据本通知接收、存储、处理和删除中国员工的数据, 并且不会将这些资料用于本通知中未说明的其他目的。</p>	<p>校友 - 前员工</p> <p>必填字段</p> <ul style="list-style-type: none"> 名字和姓氏 当前居住城市 当前居住国家 当前就业状况 当前公司 在美国银行工作的年限 最近的业务线 最近的银行办公地点 <p>可选字段</p> <ul style="list-style-type: none"> 邮寄地址 电话号码 居住国家/地区标识 员工 ID 和人员编号 感兴趣的员工群体 感兴趣的社区服务 个人资料照片 委员会成员和角色 教育信息 技能与证书 所说的语言 当前就业行业 最近经理的姓名 个人联系信息 所用社交媒体
美国银行公司	人力资源部, 美国银行校友会, 电子邮箱: alumni.network@bofa.com	<p>校友计划管理, 包括会员资格验证, 计划指标, 访问校友福利计划, 以及开展日常业务和办公室工作。</p> <p>美国银行可能在校友计划管理所需的范围内根据本通知接收、存储、处理和删除中国员工的数据, 并且不会将这些资料用于本通知中未说明的其他目的。</p>	<p>校友 - 前员工</p> <p>必填字段</p> <ul style="list-style-type: none"> 名字和姓氏 当前居住城市 当前就业状况 当前公司 在美国银行工作的年限 最近的业务线 最近的银行办公地点 <p>可选字段</p> <ul style="list-style-type: none"> 邮寄地址 电话号码 居住国家/地区标识 员工 ID 和人员编号 感兴趣的员工群体 感兴趣的社区服务 个人资料照片 委员会成员和角色

			<ul style="list-style-type: none">• 教育信息• 技能与证书• 所说的语言• 当前就业行业• 最近经理的姓名• 个人联系信息• 所用社交媒体
--	--	--	---