

APAC – China

EMPLOYEE AND CONTRACTOR DATA PROTECTION NOTICE

Effective: 1 August 2025

[Chinese Version](#)

[English version](#)

INTRODUCTION

The legal entity named on the contract of employment of the Employee, or the engagement of the Contractor (the “**Company**”) has prepared this Employee and Contractor Data Protection Notice (“**Notice**”) to outline its practices regarding the collection, use, storage, transfer and other processing of individually identifiable information about Employees or Contractors (“**Personal Data**”). For the purposes of this Notice, “**Employee**” means any individual who is, or has been employed by the Company. For the purposes of this Notice, “**Contractor**” means any individual who is engaged to provide services to the Company and who is not an employee of the Company or a non-executive director of the Company. If you are a Contractor, the terms of this Notice do not create an employment relationship between you and the Company. The Company may also provide to Employees and Contractors additional data protection or privacy notices from time to time.

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

[Chinese Version](#)

[English version](#)

PERSONAL DATA COLLECTION AND PURPOSES OF USE

Good employment and engagement practices and the effective running of our business require the Company to collect, use, store, transfer and otherwise process certain Personal Data.

The Company collects 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](#) for Employees and [Appendix B](#) for Contractors 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, such as colleagues, managers, referrals and background check providers, and public sources. Certain data listed in this notice may require additional consent which will be obtained prior to the Company collecting the data.

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 to fulfil your contract of employment or engagement with the Company and facilitate your relationship with the Company, or (for Employees) such information is necessary to conduct human resources management under the labor rules formulated and the collective contracts entered into in accordance with laws, (iii) where the process is necessary for the response to public health

emergencies, or for the protection of your life, health and property safety in emergencies, (iv) where the Personal Data is disclosed by yourself or is otherwise legally disclosed and is processed within a reasonable scope and in accordance with laws, or (v) where necessary, we obtain consent of Employees or Contractors 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 the issue may need to be escalated to Human Resources to deal with as appropriate.

SENSITIVE PERSONAL DATA

The Company may collect and process certain special categories of Personal Data (“**Sensitive Personal Data**”) about Employees, Contractors, or dependents where required by or permitted under applicable law, where necessary for the establishment, exercise or defence of legal claims, or, where necessary, the Employee or Contractor has provided their explicit (and, where applicable, written or separate) consent. Subject to applicable law, the Company may process information about:

- physical and/or mental health for the purposes of benefits administration and addressing workplace health, safety and accommodation issues
- criminal charges/convictions or unlawful behaviour for recruitment and employment screening purposes and for registration and licensing requirements
- work-related illnesses or injuries for the purpose of complying with legal obligations (or assessing entitlements)
- sexual orientation, physical and/or mental health, religious beliefs for purposes of reporting on opportunity and inclusion statistics, complying with government reporting requirements, and/or other legal obligations
- biometric data, such as fingerprints and iris scans, for the purposes of electronic identification, authentication and corporate security, at secured Company premises, or to otherwise comply with applicable law
- financial account information for the purpose of processing employee payroll
- location data for real estate facilities management and business travel purposes

We process Sensitive Personal Data in your jurisdiction if and to the extent permitted or required by applicable law. We will seek to protect such information using strict security measures further described below such that your sensitive personal information should only be processed in accordance with the applicable laws.

For further information on the purposes of using the above data, please also reference [Appendix A](#) for Employees and [Appendix B](#) for Contractors.

PERSONAL DATA ABOUT FAMILY MEMBERS AND FRIENDS

If an Employee or Contractor provides the Company with personal information about members of their family and/or other dependents and friends (e.g., for emergency contact, benefits administration purposes and volunteering), it is that Employee’s or Contractor’s responsibility to inform such individuals and obtain agreement that their data can be shared with the Company. Should the individual have any questions, please refer them to this Data Protection Notice and Section IX for contact information.

COOKIES

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

ACCESS BY COMPANY PERSONNEL

Where permitted by applicable law, access to Personal Data is restricted to those individuals who need such access for the purposes listed in this notice and [Appendix A](#) for Employees and [Appendix B](#) for Contractors, including but not limited to members of the Human Resources Department and the managers in the Employee's or Contractor's line of business, and to authorised representatives of the Company's internal control functions such as Compliance, Chief Administrative Office, Information Security, Corporate Security, Audit and Legal. Access may also be granted on a strict need-to-know basis to others where permitted by applicable law. Access to the employee/contractor **individual** shared drive is provided to direct managers for 30 days post-termination

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, including Sensitive Personal Data, to other Company 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 Employee's or Contractor's home jurisdiction. A listing of affiliates belonging to the Bank of America Corporation group can be provided upon request using the contact information provided in the Questions section of this notice.

Bank of America Corporation Group, 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](#) for Employees and [Appendix B](#) for Contractors, 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. Subject to applicable law, personal Data also may be released to protect the vital interests of Employees and Contractors, to protect the legitimate interests of the Company (unless this would prejudice the rights and freedoms or interests of the Employee or Contractor), or in the Company's judgment to comply with applicable legal or regulatory obligations and regulatory inquiries or requests.

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. This is documented in the [Information Security Monitoring Notice](#) which you should read in conjunction with this Notice.

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

Employees and Contractors 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 Employees or Contractors, or that otherwise are not subject to data subject access rights). Any Employee or Contractor who wishes to access their Personal Data or (where permitted under applicable law) request portability of their data should contact a member of the Human Resources Department using the contact information set out in Section titled “QUESTIONS” below.

- To the extent required by applicable law, Employees and Contractors have the right to have inaccurate data corrected or removed (at no charge to the Employee or Contractor and at any time) or to limit or restrict processing of their data.
- To assist the Company in maintaining accurate Personal Data, Employees and Contractors must ensure they keep their Personal Data up to date on the Company’s Global HR system. 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, Employees and Contractors 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
 - rights related to automated decision making.

For all inquiries, Employees and Contractors should contact a member of the Human Resources Department using the contact information set out in Section titled “QUESTIONS” 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.

MODALITIES OF THE PROCESSING AND DATA RETENTION

The Company does not use automated decision making on Employee or Contractor 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 Employee’s or Contractor’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 titled "PERSONAL DATA COLLECTION AND PURPOSES OF USE", whichever is longer. Any minimum/maximum storage term set forth by applicable law will prevail. The Company will delete Personal Data after the applicable retention period.

The criteria used to determine our retention periods include:

- As long as we have an ongoing relationship with the Employee or Contractor;
- 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).

QUESTIONS

Should any Employee or Contractor have any questions, concerns or complaints about this Notice, please contact the Human Resources Service Centre via hrsc.apac@bofa.com or by phone at **00800.2722.4772** or **+65.6591.1166**.

In certain countries/territories, 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:

APAC Jurisdictions:	dpo@bofa.com
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Employees and Contractors may have the right to lodge a complaint with the local Data Protection authority.

CHANGES TO THIS NOTICE

Should the Company substantially modify the way it collects or uses Personal Data, the type of Personal Data it collects or any other aspect of this Notice, it will notify Employees and Contractors as soon as reasonably possible by reissuing a revised Notice or taking other steps in accordance with applicable laws including obtaining the requisite level of Employee and Contractor consent required by law.

JURISDICTION-SPECIFIC CLAUSES

PEOPLE'S REPUBLIC OF CHINA

Please see [Appendix C](#) 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 (NAFR) Shanghai regulations, banks and insurance companies operating in Shanghai are required to disclose to NAFR 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 NAFR Shanghai’s system and is accessible by other banks and insurance companies for reference check purposes.

Consent of the Notice

I have read the “Employee and Contractor Data Protection Notice”. I expressly and voluntarily consent to the application of its terms regarding the collection, processing, use, and international transfer of my Personal Data by the Company (including Sensitive Personal Data and including international transfer of my Personal Data to jurisdictions where data protection laws may not provide an equivalent level of protection to the laws of my home jurisdiction) during and in connection with the course of my employment or engagement.

I confirm that, prior to providing any Personal Data of other individuals to the Company (if applicable), I have duly provided them with all information regarding the processing of their Personal Data and their related rights, as described in the Notice and that I have obtained the explicit (and, where applicable, written or separate) consent of those individuals, where necessary, to the processing of their Personal Data.

Please refer to instructions for how to consent to the Notice.

Please check (where applicable), sign, scan and submit a signed copy to your local HR Team:

China:

- ☐ The Company will process Personal Data as set out in this Notice and as further specified in the Cookie Policy hyperlinked to that Section. I consent to such use.
- ☐ The Company will process and retain Sensitive Personal Data (*e.g.* biometric information, credit card information, location data where relevant), as set out in Section titled “PERSONAL DATA COLLECTION AND PURPOSES OF USE” of this Notice. I consent to such use.
- ☐ The Company will transfer Personal Data to third parties **within** China, as detailed in Sections titled “DISCLOSURE” and “JURISDICTION-SPECIFIC CLAUSES” of this Notice. I consent to such transfers.
- ☐ The Company will transfer Personal Data to third parties **outside** China, as detailed in Sections titled “DISCLOSURE” and “JURISDICTION-SPECIFIC CLAUSES” of this Notice. I consent to such transfers

Employee/Contractor Name:

Signature:

Date:

Appendix A - Employee

“We” or “our” refer to Bank of America legal entities that are data controllers; “you” or “yours” refer to employees.

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. More information is listed below the table about the personal information categories.

Purpose	Examples of processing activities	Personal Information Categories
Recruitment	Recruiting and hiring, which includes the sourcing of talent (internal and external) for open roles, requisition management, screening and selecting, and facilitating the new hire process.	<ul style="list-style-type: none"> Refer to the Recruitment Data Protection Notice(s) for categories of information collected during Recruitment and Legal Basis.
Pay, Compensation, and Benefits	Designing and delivering employee compensation, incentives, and benefits/recognition.	<ul style="list-style-type: none"> Associate Investment Information Benefits Records Car registration Compensation Information Confidential Unique Identifiers Employment Disciplinary Record Employment Information Financial Account Information Health Information and veteran and disability status to manage Leaves of Absence Information you provide about Family and Friends (dependents) Job Information Life Events Additional Documentation Personal Contact Information Retirement/Pension Planning Signatures Tax Information Work Performance/ Development Information Timekeeping / Attendance/ Absence Data Visa/Citizenship Information
Employee Learning	Building required skills in the workforce via needs assessments, deployment and delivery of learning solutions, and skill adoption and measurement.	<ul style="list-style-type: none"> Employment Information Photo/ Video/ Voice Recording Personal Contact Information Job Information Skills and Qualifications Timekeeping/ Attendance/ Absence Data (i.e., leave of absence status) Virtual or In Person Events Data Work Performance/ Development Information
Talent and Performance Management	Providing training and short- and long-term development as well as the activities for managing an employee’s performance including establishing performance plans,	<ul style="list-style-type: none"> Opportunity and Inclusion Data Employment Disciplinary and Investigations Record Employment Information Job Information

Purpose	Examples of processing activities	Personal Information Categories
	monitoring, and reviewing performance, counselling employees. Also includes processes related to employee licensing and certifications.	<ul style="list-style-type: none"> • Skills and Qualifications • Swipe card entry data • Talent and Succession Planning Data • Timekeeping/ Attendance/ Absence Data • Work Performance/ Development Information
Employee Support	<p>Employee and labour relations, including investigations into concerns, support for life events, relocations, immigration, relocation-related tax reporting, the resolution of pay and benefits escalations, support for HR tools and information, engagement in Employee Networks, and information for the Alumni Network.</p> <p>*Personal information that you provide as an employee may be used to provide you with benefits and services of the Alumni Network if you become a member in the future.</p>	<ul style="list-style-type: none"> • Benefits Records • Business Travel Information • *Confidential Unique Identifiers • Compensation Information • Opportunity and Inclusion Data • Employment Disciplinary and Investigations Record • *Employment Information • *Financial account information • Health Information • Information you provide about Friends & Family (i.e., emergency contact information) • *Job Information • Outside Business Activities • *Personal Contact Information • *Retirement/Pension Planning • Signatures • Skills and Qualifications • Swipe card entry data • Tax Information • Timekeeping/ Attendance/ Absence Data • Visa/ Citizenship Information • Work Performance/ Development Information
Workforce Analytics and Reporting	Forecasting human capital needs and managing metrics concerning Workforce information.	<ul style="list-style-type: none"> • Compensation information • Opportunity and Inclusion Data • Employee engagement survey • Employment Information • Job Information • Personal Contact Information
Real Estate Facilities Management	Administering and providing operational support for all firm facilities, including leases, occupancy and space support services, and energy management. Also includes procuring and disposing of facilities, providing geographical oversight, and managing construction projects.	<ul style="list-style-type: none"> • Job Information • Timekeeping/ Attendance/Absence Data (i.e., Leave of Absence status and shift assignment (1st, 2nd, 3rd) for space management) • Signatures • Swipe card entry data
Security, Safety, and Health Operations	Activities related to the placement, maintenance, monitoring, management, and reporting on the physical safeguards to ensure security and safety for facilities, employees and clients and customers.	<ul style="list-style-type: none"> • Accident and Incident Reporting • Employment Information • Photo/ Video/ Voice Recording • Information you provide about Family and Friends (emergency contacts) • Job Information • Swipe card entry data • Health information, as necessary to promote the health and safety of the workforce and visitors to our facilities

Purpose	Examples of processing activities	Personal Information Categories
Enterprise Support Services	Supporting business and operational needs, including corporate communications, mail services, document destruction, and corporate hospitality and travel.	<ul style="list-style-type: none"> • Business Travel Information • Job Information • Personal Contact Information • Photo (e.g., Connections photo used in Skype, email, and other applications for personalization)
Access and Identity Management	Managing internal and external technology infrastructure access.	<ul style="list-style-type: none"> • Employment Information • Geolocation information, GPS information, IP address information • Photo/ Video/ Voice Recording • Job Information • Technical Information • Confidential Unique Identifiers (i.e., date of birth for authentication)
Technology Infrastructure and Operations Management	Operating and maintaining the technical infrastructure for hosting applications, including the hardware, operating systems, physical plant, and network connectivity for all computing platforms. Also includes processes for incident management impacting operations.	<ul style="list-style-type: none"> • Employment Information • Job Information • Technical Information
Information Security, Privacy, and Cyber Threat and Incident Management	Monitoring for and management of information security, privacy, and cyber threats and incidents.	<ul style="list-style-type: none"> • Any of the information listed below in The Categories of Personal Data we may Collect section along with Location Information: geolocation information, GPS information, IP address information may be used for this purpose in accordance with the relevant Information Security Monitoring Notice unless restricted by applicable law.
Business Continuity, Resiliency and Response	Establishing, maintaining, and testing plans to recover from disruptions in the businesses' ability to operate caused by natural or man-made disasters.	<ul style="list-style-type: none"> • Information you provide about Family and Friends (emergency contacts) • Job Information • Personal Contact Information
Marketing Strategy	Identifying marketing strategies and segments, the strategies for advertising, promotional campaigns, publication, and distribution of marketing materials across channels (including social media).	<ul style="list-style-type: none"> • Photo/ Video/ Voice Recording • Job Information
Manage Customer and Client Relationships	Managing the customer and client relationship through operations meetings, identifying sales opportunities, providing services, and / or managing portfolios.	<ul style="list-style-type: none"> • Photo/ Video/ Voice Recording • Job Information
Business Travel, Meeting Services and Events	Activities related to the development and management of centralized or geographical strategy and operations through third party for business travel, meeting services and events for legal entities or organization.	<ul style="list-style-type: none"> • Business Travel Information • Compensation Information • Confidential Unique Identifiers • Financial Account Information (employee expense reimbursement) • Photo/ Video/ Voice Recording • Information you provide about Family and Friends (if they are attending events) • Job Information

Purpose	Examples of processing activities	Personal Information Categories
		<ul style="list-style-type: none"> • Personal Contact Information • Signatures • Skills and Qualifications • Tax Information • Virtual or In Person Events Data • Visa/ Citizenship Information
Manage Social Responsibility: Activities	Managing the Corporate Social Responsibility Program as per legal entity or organization goals and geographical requirements, including administering volunteer and giving programs.	<ul style="list-style-type: none"> • Financial Account Information (voluntary payroll deductions) • Job Information • Photo/Video • Virtual or In Person Events Data
Employee Registration and Licensing and Certifications	Activities related to capturing (documentary evidence) professional credentials (registrations, licenses, and certifications) and ensuring they are current and compliant with applicable laws and regulations.	<ul style="list-style-type: none"> • Confidential Unique Identifiers • Employment Information • Job Information • Arrest & criminal documentation, court/legal documentation • Outside Business Activities • Securities and Stock Trading • Skills and Qualifications • Personal Contact Information
	Adhering to registration requirements	<ul style="list-style-type: none"> • Fingerprinting (applicable countries only)
Background Re-screening	Conducting re-screening for existing employees when required for regulatory purposes, e.g., fit and proper, and licensing and registration.	<ul style="list-style-type: none"> • Confidential Unique Identifiers • Arrest & criminal documentation, court/legal documentation • Outside Business Activities • Personal Contact Information • Signatures • Skills and Qualifications • Tax Information • Work eligibility status
Management of Compliance and Operational Risk	Processes related to managing compliance, operational, third party, reputational, and strategic risks.	<ul style="list-style-type: none"> • Any of the information listed below in The Categories of Personal Data we may Collect section may be used for these purposes unless restricted by applicable law
	Monitoring and managing regulated employees' compliance with applicable laws, rules, regulations and Company policies.	<ul style="list-style-type: none"> • Any of the information listed below in The Categories of Personal Data we may Collect section may be used for these purposes, in accordance with the relevant monitoring notice, unless restricted by applicable law
	Assessing adherence to Outside Business Activities – Enterprise Policy requirements and evaluating actual or perceived conflicts of interest.	<ul style="list-style-type: none"> • Outside Business Activities Information

Purpose	Examples of processing activities	Personal Information Categories
	Assessing adherence to Associate Investment Monitoring requirements and evaluating actual or perceived conflicts of interest.	<ul style="list-style-type: none"> Associate Investment Information
Regulatory Relationships and Exams	Managing regulatory relationships and exams.	<ul style="list-style-type: none"> Any of the information listed below in The Categories of Personal Data We May Collect section may be used for these purposes unless restricted by applicable law
Non-Financial Regulatory Reporting	Managing production and distribution of Non-Financial Reporting to meet regulatory requirements.	
Whistleblowing Investigations	Reviewing Personal Information provided by a whistleblower and information collected as part of an investigation into a whistleblowing concern and any follow up that is required.	
Legal Support	Legal advice and counsel required to support the business as well as publication of all legal and tax reporting requirements.	
Internal Audits	Performing independent assessments of the company's internal controls.	

The Categories of Personal Data We May Collect, Use, Transfer and Disclose, unless restricted by applicable law:

- **Accident and Incident Reporting** (Sensitive Personal Information)
- **Associate Investment Information:** Details of personal investment accounts of employee and/or the employee's Affiliates (a family member, such as a spouse, domestic partner or children who live with the employee or any other person who is financially dependent upon the employee) to ensure they are compliant with applicable laws and regulations. Includes: Investment Firm name, Investment Account number, Investment Account Transaction Reports or Statements, and Securities and stock trading activity.
- **Arrest & criminal documentation, court/legal documentation**
- **Benefits Records:** Enrollment and administration of benefits e.g., Health cover, Life Assurance, reimbursement information, family/marital status, dependent information, medical accommodations, car lease information (applicable countries only)

- Biometrics for authentication and to comply with applicable laws in relation to employee screening (Sensitive Personal Information)
- **Business Travel Information:** Visa details, Frequent Flyer ID, travel logs, and itineraries
- **Compensation Information:** Previous and current compensation, base salary, market rates, incentive payment(s), stock options and allowances
- **Confidential Unique Identifiers:** Date and place of birth, birth surname and any other former names, National ID card, National ID, Social insurance number or other tax identifier number
- **Opportunity and Inclusion Data:** Race*, ethnicity*, veteran status, age, disability status, sexual orientation*, gender, gender identity, and gender expression. (*Sensitive Personal Information) . Use of Opportunity and Inclusion Data outside of legitimate HR purposes is anonymous.
- **Employment Disciplinary and Investigations Record:** Information pertaining to any disciplinary grievances and/or concerns raised, activities and investigations
- **Employee engagement survey:** Results are reported anonymously
- **Employment Information:** Employment dates, termination details, query management records, flexible working requests, employee standing (e.g., Good Standing status)
- **Financial Account Information:** Bank account details, payroll payments and deductions and other financial information
- **Fingerprinting Data** (applicable countries only): relevant identification data (name, employee ID number, CRD number, date and place of birth) and other characteristics (height, weight, sex, hair and eye colour (using a three-letter code), Employee signature, employer; biometric data (hard copy fingerprints) and racial data. This may include criminal convictions and offenses data
- **Health Information:** Information relating to health where relevant to public health or the safety of our facilities and workforce (e.g., COVID test results)
- **Information you provide about Family and Friends:** Dependent full names and date(s) of birth, emergency contact details, name and age of child/children collected through parents or guardians attending events, dietary requirements of individuals attending an event, copy(ies) of birth certificate of employee's child(ren)
- **Job Information:** Job title and/or position and description of responsibilities/duties, job family, location, band/seniority, Employee Identifiers (e.g., Person Number), department, line and sub-line of business, local Company entity name, cost centre information, supervisor/manager/team lead name and contact information, reporting structure, work contact information
- **Life Events Additional Documentation:** Medical/diagnosis documentation; personal circumstances; Return to Work Release Documentation; Death Certificate and Death Benefit documentation including beneficiary personal contact information and details; restraining orders, family custody legal/ orders; criminal records; military orders and documentation; personal insurance documentation e.g., house fire/hurricane damage report, health information for Fitness for Duty form, & Medical release of information with provider details (e.g., therapist name), arrest & criminal documentation, Court/legal documentation, Marriage & divorce certificates, Trust or estate documentation & ID numbers, Birth Certificates, sickness certificates.
- **Outside Business Activities:** Details of outside business activities and directorships (where relevant for employment-related purposes)

- **Personal Contact Information:** Address, Telephone, email
- **Photo/ Video/ Voice Recording:** Video recording, CCTV, photograph, voice recording/data
- **Retirement/Pension Planning:** Information related to pension and retirement
- **Securities and Stock Trading:** Activity/experience (where relevant for employment-related purposes)
- **Signatures:** Including digital images and physical copies
- **Skills and Qualifications:** Pre-employment references, employment history, language(s) spoken, reference letters, academic record, professional qualifications and memberships, professional training, company internal training, licenses and certifications, financial regulatory registration, areas of expertise general management experience, leadership behavior
- **Swipe card entry data**
- **Talent and Succession Planning Data:** Mobility preferences, date assigned to a talent pool, talent pool name and description, strengths, and development needs
- **Tax Information:** Tax contributions, tax forms
- **Technical Information:** Username and passwords, IP address, domain, browser type, operating system click-stream data and system logs, electronic and non-electronic content and documents created or produced by you using Company systems or in the performance of your role with the Company
- **Timekeeping/ Attendance/ Absence Data:** Shift and overtime data, absence details, e.g., sickness, holiday, and leaves of absence
- **Virtual or In Person Events Data:** Speaker biographies, travel details, spouse/partner name, special assistance needs of individuals attending an event, name and age of child/children collected through parents or guardians, dietary requirements of individuals attending an event
- **Visa/ Citizenship Information:** Work eligibility status, entitlement to residency, citizenship, visa details, passport details
- **Work Performance/ Development Information:** Assessments and ratings (results rating, behaviour rating, potential rating), performance goals description, key competencies description, areas for development, coaching notes, feedback from others (e.g., 360), self-assessment description, manager review description, performance expectations, measurement criteria, action dates, manager progress notes, career development information

Third Parties with Whom We May Share Personal Information

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 outlined in the table below and, where applicable, in accordance with Section XI. Jurisdiction Specific Clauses of this Notice.

Type of Recipient	Personal Information Categories
<p>Professional Advisors: Accountants, auditors, lawyers, insurers, bankers, tax advisors and other outside professional advisors in all the countries in which the Company operates.</p>	<p>Personal information is shared, unless restricted by applicable law, with Professional Advisors and Service Providers to the extent they provide services that align with the purposes in the table above. The Personal Information categories shared with Professional Advisors and Service Providers aligns with the services they provide to the Company, including:</p> <ul style="list-style-type: none"> • Accident and Incident Reporting • Benefits Records • Business Travel Information • Compensation Information
<p>Service Providers: Companies that provide products and services to the Company in the countries in which the Company operates, such as payroll, partner banks, pension scheme, benefits providers; asset managers that advise or sponsor investment products that the Company distributes to its clients; human resources services, recruitment and training providers; performance management, training, expense management, IT systems suppliers and support; reception and security, catering and logistics services providers, translation services, third parties assisting with event organizing and marketing activities, medical or health practitioners, trade bodies and associations, real estate management, and other service providers.</p> <p>Note: Where appropriate, the Company will offer and receive reasonable assistance from third parties (such as service providers) to respond to data subject access requests.</p>	<ul style="list-style-type: none"> • Confidential Unique Identifiers • Opportunity and Inclusion Data • Employment Disciplinary and Investigations Record • Employment Information • Financial Account Information • Health Information • Photo/ Video/ Voice Recording • Information you provide about Family and Friends • Job Information • Outside Business Activities • Personal Contact Information • Retirement/Pension Planning • Securities and Stock Trading • Signatures • Skills and Qualifications • Swipe card entry data • Talent and Succession Planning Data • Tax Information • Technical Information • Timekeeping/ Attendance/ Absence Data • Virtual or In Person Events Data • Visa/ Citizenship Information • Work Performance/ Development Information
<p>Public and Governmental Authorities: Entities that regulate or have jurisdiction over the Company in the countries in which the Company operates, such as regulatory authorities, law enforcement, public bodies, licensing and registration bodies, judicial bodies and third parties appointed by such authorities.</p>	<ul style="list-style-type: none"> • Accident and Incident Reporting • Business Travel Information • Compensation Information • Opportunity and Inclusion Data (aggregate) • Employment Disciplinary and Investigations Record • Employment Information • Fingerprinting Data (applicable countries only)

	<ul style="list-style-type: none"> • Health Information (aggregate) • Photo/ Video/ Voice Recording • Job Information • Outside Business Activities • Retirement/Pension Planning • Securities and Stock Trading • Signatures • Skills and Qualifications • Tax Information (aggregate) • Timekeeping/ Attendance/ Absence Data • Visa/ Citizenship Information
Parties Related to a Corporate Transaction: A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Company's business, assets or stock (including in connection with any bankruptcy or similar proceedings), e.g., stock exchanges and business counterparties.	<ul style="list-style-type: none"> • Compensation Information • Confidential Unique Identifiers • Employment Information • Job Information • Skills and Qualifications • Talent and Succession Planning Data • Virtual or In Person Events Data • Visa/ Citizenship Information • Work Performance/ Development Information
Bank/Trade Unions: Bank/Trade unions to which the Employees are affiliated.	<ul style="list-style-type: none"> • Employment information • Job Information • Skills and Qualifications
Current or prospective customers and clients.	<ul style="list-style-type: none"> • Photo/ Video/ Voice Recording • Job Information
Event Vendors: Event vendors, organizers, speakers, volunteers, contractors, and sponsors to facilitate events	<ul style="list-style-type: none"> • Business Travel Information • Photo/ Video/ Voice Recording • Information you provide about Family and Friends (if they are attending events) • Job Information • Personal Contact Information • Virtual or In Person Events Data
Online Tracking providers: To improve technical and design features of our websites and platforms	<ul style="list-style-type: none"> • IP Address

Appendix B – Contractors

“We” or “our” refer to Bank of America legal entities that are data controllers; “you” or “yours” refer to contractors.

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. More information is listed below the table about the personal information categories.

Purpose	Examples of processing activities	Personal Information Categories
Pay, Compensation	Designing and delivering contractor compensation.	<ul style="list-style-type: none"> • Confidential Unique Identifiers • Employment Information • Financial Account Information • Information you provide about Family and Friends (dependents) • Job Information • Personal Contact Information • Signatures • Skills and Qualifications • Tax Information • Timekeeping/ Attendance/ Absence Data • Visa/Citizenship Information
Workforce Learning	Building required skills in the workforce via needs assessments, deployment and delivery of learning solutions, and skill adoption and measurement.	<ul style="list-style-type: none"> • Employment Information • Photo/ Video/ Voice Recording • Personal Contact Information • Job Information • Skills and Qualifications • Timekeeping/ Attendance/ Absence Data (i.e., leave of absence status) • Virtual or In Person Events Data
Workforce Support	Workforce relations, relocations, immigration, relocation-related tax reporting, the resolution of pay escalations, and support for HR tools and information.	<ul style="list-style-type: none"> • Business Travel Information • Opportunity and Inclusion Data • Employment Disciplinary and Investigations Record • Employment Information • Job Information • Outside Business Activities • Personal Contact Information • Signatures • Skills and Qualifications • Swipe card entry data • Tax Information • Timekeeping/ Attendance/ Absence Data • Visa/ Citizenship Information
Workforce Analytics and Reporting	Forecasting human capital needs and managing metrics concerning Workforce information.	<ul style="list-style-type: none"> • Opportunity and Inclusion Data • Employment Information • Job Information • Personal Contact Information

Purpose	Examples of processing activities	Personal Information Categories
Real Estate Facilities Management	Administering and providing operational support for all firm facilities, including leases, occupancy and space support services, and energy management. Also includes procuring and disposing of facilities, providing geographical oversight, and managing construction projects.	<ul style="list-style-type: none"> • Job Information • Signatures • Swipe card entry data
Security, Safety, and Health Operations	Activities related to the placement, maintenance, monitoring, management, and reporting on the physical safeguards to ensure security and safety for facilities, the workforce and clients and customers.	<ul style="list-style-type: none"> • Accident and Incident Reporting • Employment Information • Photo/ Video/ Voice Recording • Information you provide about Family and Friends (emergency contacts) • Job Information • Swipe card entry data • Health information, as necessary to promote the health and safety of the workforce and visitors to our facilities
Enterprise Support Services	Supporting business and operational needs, including corporate communications, mail services, document destruction, and corporate hospitality and travel.	<ul style="list-style-type: none"> • Business Travel Information • Job Information • Personal Contact Information • Photo (e.g., Connections photo used in Skype, email, and other applications for personalization)
Access and Identity Management	Managing internal and external technology infrastructure access.	<ul style="list-style-type: none"> • Employment Information • Geolocation information, GPS information, IP address information • Photo/ Video/ Voice Recording • Job Information • Technical Information • Confidential Unique Identifiers (i.e., date of birth for authentication)
Technology Infrastructure and Operations Management	Operating and maintaining the technical infrastructure for hosting applications, including the hardware, operating systems, physical plant, and network connectivity for all computing platforms. Also includes processes for incident management impacting operations.	<ul style="list-style-type: none"> • Employment Information • Job Information • Technical Information
Information Security, Privacy, and Cyber Threat and Incident Management	Monitoring for and management of information security, privacy, and cyber threats and incidents.	<ul style="list-style-type: none"> • Any of the information listed below in The Categories of Personal Data we may Collect section along with Location Information: geolocation information, GPS information, IP address information may be used for this purpose in accordance with the relevant Information Security Monitoring Notice unless restricted by applicable law.
Business Continuity,	Establishing, maintaining, and testing plans to recover from disruptions in the businesses'	<ul style="list-style-type: none"> • Information you provide about Family and Friends (emergency contacts) • Job Information

Purpose	Examples of processing activities	Personal Information Categories
Resiliency and Response	ability to operate caused by natural or man-made disasters.	<ul style="list-style-type: none"> • Personal Contact Information
Marketing Strategy	Identifying marketing strategies and segments, the strategies for advertising, promotional campaigns, publication, and distribution of marketing materials across channels (including social media).	<ul style="list-style-type: none"> • Photo/ Video/ Voice Recording • Job Information
Manage Customer and Client Relationships	Managing the customer and client relationship through operations meetings, identifying sales opportunities, providing services, and / or managing portfolios.	<ul style="list-style-type: none"> • Photo/ Video/ Voice Recording • Job Information
Business Travel, Meeting Services and Events	Activities related to the development and management of centralized or geographical strategy and operations through third party for business travel, meeting services and events for legal entities or organization.	<ul style="list-style-type: none"> • Business Travel Information • Confidential Unique Identifiers • Photo/ Video/ Voice Recording • Information you provide about Family and Friends (if they are attending events) • Job Information • Personal Contact Information • Signatures • Tax Information • Virtual or In Person Events Data • Visa/ Citizenship Information
Workforce Registration and Licensing and Certifications	Activities related to capturing (documentary evidence) professional credentials (registrations, licenses, and certifications) and ensuring they are current and compliant with applicable laws and regulations.	<ul style="list-style-type: none"> • Confidential Unique Identifiers • Employment Information • Job Information • Outside Business Activities • Securities and Stock Trading • Skills and Qualifications
	Adhering to registration requirements	<ul style="list-style-type: none"> • Fingerprinting (applicable countries only)
Management of Compliance and Operational Risk	Processes related to managing compliance, operational, third party, reputational, and strategic risks.	<ul style="list-style-type: none"> • Any of the information listed below in The Categories of Personal Data we may Collect section may be used for these purposes unless restricted by applicable law
	Monitoring and managing regulated employees' compliance with applicable laws, rules, regulations and Company policies.	<ul style="list-style-type: none"> • Any of the information listed below in The Categories of Personal Data we may Collect section may be used for these purposes, in accordance with the relevant monitoring notice, unless restricted by applicable law
	Assessing adherence to Outside Business Activities – Enterprise Policy requirements and evaluating actual or perceived conflicts of interest.	<ul style="list-style-type: none"> • Outside Business Activities Information

Purpose	Examples of processing activities	Personal Information Categories
	Assessing adherence to Associate Investment Monitoring requirements and evaluating actual or perceived conflicts of interest.	<ul style="list-style-type: none"> • Associate Investment Information
Regulatory Relationships and Exams	Managing regulatory relationships and exams.	<ul style="list-style-type: none"> • Any of the information listed below in The Categories of Personal Data We May Collect section may be used for these purposes unless restricted by applicable law
Non-Financial Regulatory Reporting	Managing production and distribution of Non-Financial Reporting to meet regulatory requirements.	
Whistleblowing Investigations	Reviewing Personal Information provided by a whistleblower and information collected as part of an investigation into a whistleblowing concern and any follow up that is required.	
Legal Support	Legal advice and counsel required to support the business as well as publication of all legal and tax reporting requirements.	
Internal Audits	Performing independent assessments of the company's internal controls.	

The Categories of Personal Data We May Collect, Use, Transfer and Disclose, unless restricted by applicable law:

- **Accident and Incident Reporting** (Sensitive Personal Information)
- **Associate Investment Information:** Details of personal investment accounts of employee and/or the employee's Affiliates (a family member, such as a spouse, domestic partner or children who live with the employee or any other person who is financially dependent upon the employee) to ensure they are compliant with applicable laws and regulations. Includes: Investment Firm name, Investment Account number, Investment Account Transaction Reports or Statements, and Securities and stock trading activity.
- **Biometrics** for authentication and to comply with applicable laws in relation to workforce screening (Sensitive Personal Information)
- **Business Travel Information:** Visa details, Frequent Flyer ID, travel logs, and itineraries
- **Confidential Unique Identifiers:** Date and place of birth, birth surname and any other former names, National ID card, National ID, Social insurance number or other tax identifier number
- **Opportunity and Inclusion Data:** Race*, ethnicity*, veteran status, age, disability status, sexual orientation*, gender, gender identity, and gender expression. (*Sensitive Personal Information). Use of Opportunity and Inclusion Data outside of legitimate HR purposes is anonymous data.
- **Employment Disciplinary and Investigations Record:** Information pertaining to any disciplinary grievances and/or concerns raised, activities and investigations

- **Employment Information:** Employment dates, termination details, query management records, flexible working requests
- **Financial Account Information:** Bank account details, payroll payments and deductions and other financial information
- **Fingerprinting Data** (applicable countries only): relevant identification data (name, employee ID number, CRD number, date and place of birth) and other characteristics (height, weight, sex, hair and eye colour (using a three-letter code), Employee signature, employer; biometric data (hard copy fingerprints) and racial data. This may include criminal convictions and offenses data
- **Health Information:** Information relating to health where relevant to public health or the safety of our facilities and workforce (e.g., COVID test results)
- **Information you provide about Family and Friends:** Emergency contact details, name and age of child/children collected through parents or guardians attending events, dietary requirements of individuals attending an event
- **Job Information:** Job title and/or position and description of responsibilities/duties, job family, location, band/seniority, Employee Identifiers (e.g., Person Number), department, line and sub-line of business, local Company entity name, cost centre information, supervisor/manager/team lead name and contact information, reporting structure, work contact information
- **Outside Business Activities:** Details of outside business activities and directorships (where relevant for employment-related purposes)
- **Personal Contact Information:** Address, Telephone, email
- **Photo/ Video/ Voice Recording:** Video recording, CCTV, photograph, voice recording/data
- **Securities and Stock Trading:** Activity/experience (where relevant for employment-related purposes)
- **Signatures:** Including digital images and physical copies
- **Skills and Qualifications:** Pre-employment references, employment history, language(s) spoken, reference letters, academic record, professional qualifications and memberships, professional training, company internal training, licenses and certifications, financial regulatory registration, areas of expertise general management experience, leadership behavior
- **Swipe card entry data**
- **Technical Information:** Username and passwords, IP address, domain, browser type, operating system click-stream data and system logs, electronic and non-electronic content and documents created or produced by you using Company systems or in the performance of your role with the Company
- **Timekeeping/ Attendance/ Absence Data:** Shift and overtime data, absence details, e.g., sickness, holiday, and leaves of absence
- **Virtual or In Person Events Data:** Speaker biographies, travel details, spouse/partner name, special assistance needs of individuals attending an event, name and age of child/children collected through parents or guardians, dietary requirements of individuals attending an event
- **Visa/ Citizenship Information:** Work eligibility status, entitlement to residency, citizenship, visa details, passport details

Third Parties with Whom We May Share Personal Information

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 outlined in the table below and, where applicable, in accordance with Section XI. Jurisdiction Specific Clauses of this Notice. The Company may provide consent to third parties to process employee and contractor personal information as described below.

Type of Recipient	Personal Information Categories
<p>Professional Advisors: Accountants, auditors, lawyers, insurers, bankers, tax advisors and other outside professional advisors in all the countries in which the Company operates.</p>	<p>Personal information is shared, unless restricted by applicable law, with Professional Advisors and Service Providers to the extent they provide services that align with the purposes in the table above. The Personal Information categories shared with Professional Advisors and Service Providers aligns with the services they provide to the Company, including:</p> <ul style="list-style-type: none"> • Accident and Incident Reporting • Business Travel Information • Confidential Unique Identifiers • Opportunity and Inclusion Data • Employment Disciplinary and Investigations Record • Employment Information • Financial Account Information • Health Information • Photo/ Video/ Voice Recording • Information you provide about Family and Friends • Job Information • Outside Business Activities • Personal Contact Information • Securities and Stock Trading • Signatures • Skills and Qualifications • Swipe card entry data • Technical Information • Timekeeping/ Attendance/ Absence Data • Virtual or In Person Events Data • Visa/ Citizenship Information
<p>Service Providers: Companies that provide products and services to the Company in the countries in which the Company operates, such as benefits providers; asset managers that advise or sponsor investment products that the Company distributes to its clients; human resources services, recruitment and training providers; training, expense management, IT systems suppliers and support; reception and security, catering and logistics services providers, translation services, third parties assisting with event organizing and marketing activities, trade bodies and associations, real estate management, and other service providers including, where applicable, your employer or company.</p> <p>Note: Where appropriate, the Company will offer and receive reasonable assistance from third parties (such as service providers) to respond to data subject access requests.</p>	
<p>Public and Governmental Authorities: Entities that regulate or have jurisdiction over the Company in the countries in which the Company operates, such as regulatory authorities, law enforcement, public bodies, licensing and registration bodies, judicial bodies and third parties appointed by such authorities.</p>	<ul style="list-style-type: none"> • Accident and Incident Reporting • Business Travel Information • Compensation Information • Opportunity and Inclusion Data (aggregate) • Employment Disciplinary and Investigations Record • Employment Information

	<ul style="list-style-type: none"> • Fingerprinting Data (applicable countries only) • Health Information (aggregate) • Photo/ Video/ Voice Recording • Job Information • Outside Business Activities • Securities and Stock Trading • Signatures • Skills and Qualifications • Tax Information (aggregate) • Timekeeping/ Attendance/ Absence Data • Visa/ Citizenship Information
Parties Related to a Corporate Transaction: A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Company's business, assets or stock (including in connection with any bankruptcy or similar proceedings), e.g., stock exchanges and business counterparties.	<ul style="list-style-type: none"> • Compensation Information • Confidential Unique Identifiers • Employment Information • Job Information • Skills and Qualifications • Virtual or In Person Events Data • Visa/ Citizenship Information
Trade Unions: Trade unions to which the Contractors are affiliated.	<ul style="list-style-type: none"> • Employment information • Job Information • Skills and Qualifications
Current or prospective customers and clients.	<ul style="list-style-type: none"> • Photo/ Video/ Voice Recording • Job Information
Event Vendors: Event vendors, organizers, speakers, volunteers, contractors, and sponsors to facilitate events. Contractors must not participate in events unless the event is directly related to the work assignment.	<ul style="list-style-type: none"> • Business Travel Information • Photo/ Video/ Voice Recording • Information you provide about Family and Friends (if they are attending events) • Job Information • Personal Contact Information • Virtual or In Person Events Data
Online Tracking providers: To improve technical and design features of our websites and platforms	<ul style="list-style-type: none"> • IP Address

Appendix C

Organizations To Which We May Disclose Personal Data

Details on Rights are included in Section titled "ACCESS, PORTABILITY, RECTIFICATION AND SUPPRESSION, LIMITATION AND RESTRICTION OF PROCESSING AND ACCURACY OF PERSONAL DATA" of the Notice

Domestic Recipient			
Name	Contact Information	Processing Purpose and Method	Category of Personal Data

CHINA INTERNATIONAL INTELLECTECH GROUP CO.,LTD.	Mr. Yong, Guangming gastuyong@ciicsh.com +8621 3397 2334	Payroll and compensation processing; Complying with local or foreign state and/or country/territory specific tax and immigration laws and regulations and payroll reporting, not limited to but including business travel; Statutory benefits management/processing	Payroll: national ID card; bank account details; full address; tax and social security contributions; payroll payments and deductions and other financial information. Statutory benefits: national ID Card, social insurance card, residence card, personal contact information, opportunity data (e.g., gender/disability certificate), party affiliation, education, job information, childbirth certificate, emergency contacts, personal email address, signature
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Overseas Recipient			
Name	Contact Information	Processing Purpose and Method	Category of Personal Data
Bank of America, N.A.	Human Resources Service Centre via hrsc.apac@bofa.com or by phone at 00800.2722.4772 or +65.6591.1166	Hierarchical management, internal promotion, performance evaluation, conduct internal and external communication and coordination and carry out daily business and office work. Bank of America, N.A. may receive, store, process, and delete the data of China employees in accordance with this Notice to the extent necessary for human resources management, and will not use the data for other purposes not stated within this Notice	<p>Employee:</p> <ul style="list-style-type: none"> • Accident and Incident Reporting • Benefits Records • Business Travel Information • Compensation Information • Confidential Unique Identifiers (i.e., date of birth for authentication) • Opportunity and Inclusion Data • Opportunity Data (e.g., gender to plan for restroom facilities) • Employee engagement survey • Employment Disciplinary Record • Employment Information • Financial Account Information (employee expense reimbursement, voluntary payroll deductions) • Health information, as necessary to promote the health and safety of the workforce and visitors to our facilities • Information you provide about Family and Friends: dependents, emergency contacts, if they are attending events • Job Information • Life Event Documentation (arrest & criminal documentation, court/legal documentation) • Outside Business Activities • Personal Contact Information • Photo/ Video/ Voice Recording • Retirement/Pension Planning • Securities and Stock Trading • Signatures • Skills and Qualifications

			<ul style="list-style-type: none"> • Swipe card entry data • Talent and Succession Planning Data 	
			<ul style="list-style-type: none"> • Tax Information • Technical Information 	
			<ul style="list-style-type: none"> • Timekeeping/ Attendance/ Absence Data (i.e., leave of absence status) • Virtual or In Person Events Data 	
			<ul style="list-style-type: none"> • Visa/ Citizenship Information • Work eligibility status • Work Performance/ Development Information 	
			<p>Contractor:</p> <ul style="list-style-type: none"> • Accident and Incident Reporting • Business Travel Information • Confidential Unique Identifiers (i.e., date of birth for authentication) • Opportunity and Inclusion Data • Employment Disciplinary Record • Employment Information • Financial Account Information • Health information, as necessary to promote the health and safety of the workforce and visitors to our facilities • Information you provide about Family and Friends: dependents, emergency contacts, if they are attending events • Job Information • Outside Business Activities • Personal Contact Information • Photo/ Video/ Voice Recording • Securities and Stock Trading • Signatures • Skills and Qualifications • Swipe card entry data • Technical Information • Timekeeping/ Attendance/ Absence Data (i.e., leave of absence status) • Virtual or In Person Events Data • Visa/ Citizenship Information 	

员工与短期合同工数据保护通知 生效日期：2025 年 8 月 1 日

[中文版](#)

[English version](#)

引言

员工雇佣合同或者短期合同工聘用合同上指明的法律实体（本“公司”）已制作本员工和短期合同工数据保护通知（“通知”），列明其关于收集、使用、存储、传输和以其他方式处理关于员工或短期合同工的个人可识别信息（“个人数据”）的实践。就本通知而言，“员工”指受本公司雇佣或已被本公司雇佣的任何人士。就本通知而言，“短期合同工”指受聘为本公司提供服务而非本公司雇员或非本公司执行董事的任何人士。如果您是短期合同工，本通知的条款和条件不会在您与本公司之间建立雇佣关系。本公司也可不时向员工和短期合同工提供其他数据保护或隐私通知。

若本通知以中文以外的其他语言提供给员工或短期合同工，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中文版本的方式予以解决（除非适用法律另有规定）。

[中文版](#)

[English version](#)

个人数据收集和使用目的

良好的雇佣惯例以及业务的有效运转需要本公司收集、使用、存储、传输以及以其他方式处理特定的个人数据。

本公司收集同其业务直接相关的、履行其法律义务所需或适用法律另作规定允许收集的个人数据。本通知[附录 A](#)（适用于员工）以及[附录 B](#)（适用于短期合同工）中列明了我们收集的个人数据的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）。我们从您和其他来源收取个人数据，例如同事、领导、推荐人、背景调查提供者和公共来源。本公司在收集本通知中列出的某些数据之前可能需要就数据收集获得额外同意。

我们收集并处理有关您的个人数据：(i) 因为适用法律要求或者允许我们进行收集和处理，(ii) 因为此等信息对于履行您与公司的雇佣或聘用合同并促进您与公司的关系是必要的，或者（对于员工而言）此等信息对于根据依法制定的劳动规则和依法签订的集体合同开展人力资源管理是必要的，(iii) 为响应公共卫生紧急事件，或为在紧急状态下保护您的生命、健康和财产安全而必需进行处理，(iv) 个人数据由您本人披露，或以其它方式合法披露并在合理范围内依法进行处理，或(v) 必要时，我们会取得员工或短期合同工对于收集和处理个人数据的同意。

如果您不提供某些类别的个人数据，本公司可能无法实现本通知中列明的某些目的，且该问题可能需要上报至人力资源部适当处理。

敏感的个人数据

在下列情况下，本公司可收集和处理有关员工、短期合同工或家属的某些特殊类别的个人数据（“**敏感的个人数据**”）：适用法律要求或许可；确立、行使或辩护法律主张需要；或者在必要时，员工或短期合同工已提供其明确同意（且在适用时提供书面形式或单独的同意）。根据适用法律，本公司可能会处理有关以下方面的信息：

- 用于管理福利，以及解决工作场所健康、安全和住宿问题的身体和/或心理健康信息
- 用于进行招聘和雇佣筛查，以及满足注册和许可要求的刑事指控/定罪或非法行为信息，
- 以便履行法律义务（或评估应有权利）的工作相关疾病或受伤信息
- 用于报告机会和包容性统计数据、遵守政府报送要求和/或履行其他法律义务的性取向、身体和/或心理健康、宗教信仰的信息，
- 生物特征数据，如在安全的本公司场所进行指纹和虹膜扫描，并用于电子身份识别、验证和公司安全，或另行遵守适用的法律
- 用于处理员工工资单目的的财务账户信息
- 用于不动产设施管理和商务旅行目的的位置信息

如果适用法律允许或要求，我们将在您所属的司法辖区处理敏感个人数据。我们将采用下文详述的严格安全措施保护此等信息，确保仅依据适用法律处理您的敏感个人信息。

关于使用上述数据之目的的更多信息，另请参考[附录 A](#)（适用于员工）以及[附录 B](#)（适用于短期合同工）。

有关家属与朋友的个人数据

如果员工或短期合同工向本公司提供有关其家人和/或其他家属与朋友的个人信息（例如出于紧急联系，福利管理和志愿活动的目的），该员工或短期合同工应有责任通知此类人士并就其数据可被共享至本公司取得他们的同意。若此类人士对此有任何疑问，请指引他们参阅本数据保护通知并通过第 IX 部分的联系信息与本公司联系。

Cookies

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](#)。

本公司员工访问

在适用法律允许的情况下，个人数据访问仅限于为实现[附录 A](#)（适用于员工）和[附录 B](#)（适用于短期合同工）中所列目的而需要此类访问的人士，包括但不限于人力资源部人员和员工或短期合同工的业务经理，以及本公司内部控制职能部门（如合规、总行政办公室、信息安全部、公司安全部、审计部和法律部）的授权代表。在适用法律允许的情况下，访问权也可基于严格的需知规定授予他人。直线经理可在离职后 30 天内访问员工/短期合同工个人共享文件夹。

披露

在适用法律允许的范围内以及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（包括敏感的个人数据）传输至其他司法管辖区内的其他本公司关联企业或营业地，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员工或短期合同工原属司法管辖区法律保护程度的其他司法管辖区。如需获取美国银行公司集团关联企业的名单，请通过本通知“问题”一节提供的联系信息提出请求。

美国银行公司集团，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器处理个人数据，比如[附录 A](#)（适用于员工）以及[附录 B](#)中所列的数据处理器，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器，并确保该处理器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。在遵守适用法律的前提下，出于保护员工和短期合同工的切身利益、保护本公司合法权益（此行为会侵害员工或短期合同工的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调查或要求，也可发布个人数据。

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。这些信息记录在[《信息安全监控通知》](#)，您应结合本通知一并阅读。

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

员工和短期合同工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任何文件、提供其他员工或短期合同工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）。任何员工或短期合同工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，应联系人力资源部人员，联系信息见下述“问题”章节。

- 在适用法律要求的范围内，员工和短期合同工有权更正或删除不准确的数据（任何时候均可，不向员工或短期合同工收取任何费用）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，员工和短期合同工必须确保其在本公司全球人力资源系统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。
- 在根据适用法律可获得的范围内，员工和短期合同工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；
 - 与自动化决策相关的权利。

对于所有咨询，员工和短期合同工应联系人力资源部人员，联系信息见下述“问题”章节。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。

处理形式和数据保留

本公司对员工或短期合同工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。个人数据可存储在员工或短期合同工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“个人数据收集和使用目的”章节中所述的使用和处理目的所需的期限保留个人数据，以两个期限中较长者为准。保留期限将以适用法律规定的最短/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。

用于决定保留期限的标准包括：

- 只要我们与员工或短期合同工继续保持关系；
- 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。

问题

任何员工或短期合同工如对本通知有任何问题、疑惑或投诉，请联系人力资源服务中心，电子邮件：hrsc.apac@bofa.com，或电话：00800.2722.4772 或 +65.6591.1166。

在某些国家/地区，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：

亚太地区司法管辖区	dpo@bofa.com
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员工和短期合同工有权向当地的数据保护机构提出投诉。

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，将通过重新发出修订后的通知或依据适用法律采取其他措施，包括在法律要求时取得必要等级的员工和短期合同工同意，尽快通知员工和短期合同工。

司法管辖区专用条款

中华人民共和国

[附录 C](#) 中的列表列出了接收我们作为在中国的数据控制者（可独立确定个人数据处理活动中的处理目的和处理方法）向其传输个人数据的组织和中国境外的其他接收方，他们各自的联系方式以及关于此等组织处理您的哪些个人数据、如何处理、为什么处理、（要求时）如何对这些组织行使您的数据隐私权等详细信息。如果您希望向境外接收方行使个人数据保护相关的权利，可以通过本通知“问题”一节提供的联系方式提出申请。在我们将您的个人数据传输到中国境外后，中国境外的数据控制者也可能将您的部分出境个人数据提供给我们的关联企业或受委托提供相关服务（如软件和托管服务以及福利和保险行政管理）的第三方服务供应商，或允许他们在提供此

类服务的必要范围内访问个人数据。

适用法律要求或允许时，我们会在以雇佣为目的处理敏感数据时以合理考虑并减轻(在适用的情况下)对您的权利和利益造成负面影响的方式来处理。

根据国家金融监管总局(NAFR)上海监管局的规定，在上海经营的银行保险机构必须向 NAFR 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、工作流动和纪律处分信息。此类信息记录在 NAFR 上海监管局的系统中，供辖内其他银行保险公司查询。

关于本通知的同意书

我已阅读“员工与短期合同工数据保护通知”。本人明确及自愿同意其条款的应用，条款关于本公司在本人受雇或受聘期间以及就该期间收集、处理、使用和跨国传输本人的个人数据（包括敏感的个人数据，以及将本人的个人数据跨国传输至当地数据保护法律提供的法律保护程度可能不同于本人原属司法管辖区法律保护程度的司法管辖区）。

本人确认在向公司提供其他人士的任何个人数据（如适用）前，本人已向该等人士妥善提供有关本通知所述个人数据处理及其相关权利的所有信息，并且本人已取得(如需要)该等人士就处理其个人数据的明示同意（且在适用的情况下以书面形式作出或单独作出）。

请参阅关于如何同意本通知的说明。

请勾选（适用项）、签字、扫描并将签字后文件提交给您当地的 HR 团队：

中国：

- ☐ 公司将按本通知规定以及超链接至相应章节的“Cookie 政策”中的进一步规定处理个人数据。我同意该等使用。
- ☐ 公司将处理并保留敏感个人数据（例如，生物特征信息、信用卡信息、相关的位置数据），详见本通知的“个人数据收集和使用目的”章节。我同意该等使用。
- ☐ 公司将向中国境内的第三方传输个人数据，详见本通知的“披露”和“司法辖区专用条款”章节。我同意该等传输。
- ☐ 公司将向中国境外的第三方传输个人数据，详见本通知的“披露”和“司法辖区专用条款”章节。我同意该等传输。

员工/短期合同工姓名：

签名：

日期：

附录 A - 员工

“我们”或“我们的”指的是作为数据控制者的美国银行法律实体；“您”或“您的”指的是员工。

下表包含了我们可能处理您的个人数据的目的、可能进行的处理活动类型以及用于此类处理的个人信息类型。表格下方列出了有关个人信息类型的更多信息。

目的	处理活动示例	个人信息类型
招聘	招聘和录用，包括为空缺职位寻找来自内部和外部的人才、征用管理、筛选和选择，以及推进新员工录用流程。	<ul style="list-style-type: none">有关招聘期间收集的信息类型与合法性基础，请参见《招聘数据保护通知》。
支付，薪酬与福利	设计并提供员工薪酬、奖励和福利以及表彰。	<ul style="list-style-type: none">员工投资信息福利记录车辆登记信息薪酬信息保密的唯一识别信息工作违纪记录雇佣信息金融账户信息因管理员工休假所需要的健康信息以及参军和残疾情况您提供的关于家庭和友人的信息（家属）工作信息人生事件补充文件个人联系信息退休/养老金计划签名税务信息工作绩效/职业发展信息计时/考勤/请假数据签证/国籍信息
员工学习	通过需求评估、部署和提供学习解决方案以及技能应用和考核，培养员工所需的技能。	<ul style="list-style-type: none">雇佣信息照片/视频/录音个人联系信息工作信息技能和资质计时/考勤/请假数据（即请假状态）远程或线下活动数据工作绩效/职业发展信息

人才和绩效管理	提供培训、短期和长期发展，以及管理员工绩效的活动，包括制定绩效计划、监督和审查绩效、为员工提供咨询以及员工许可和认证相关流程。	<ul style="list-style-type: none"> • 机会和包容性数据 • 工作违纪和调查记录 • 雇佣信息 • 工作信息 • 技能和资质 • 刷卡门禁数据 • 人才和继任计划数据 • 计时/考勤/请假数据 • 工作绩效/职业发展信息
员工支持	<p>劳工关系（包括对疑虑情况的调查）、日常生活支持、搬迁、移民、与搬迁相关的税务申报、提升薪酬和福利的解决方案，人力资源工具和信息支持，参与员工社群的情况以及校友会信息。</p> <p>*如果您将来成为校友会的会员，您作为员工提供的个人信息可能会被用于向您提供校友会的福利和服务的过程。</p>	<ul style="list-style-type: none"> • 福利记录 • 商旅信息 • *保密的唯一身份标识符 • 薪酬信息 • 机会和包容性数据 • 工作违纪和调查记录 • *雇佣信息 • *财务账户信息 • 健康信息 • 您提供的关于家庭和朋友的信息（即紧急联系人信息） • *工作信息 • 外部业务活动 • *个人联系信息 • *退休/养老金计划 • 签名 • 技能与资格 • 刷卡门禁数据 • 税务信息 • 计时/考勤/请假数据 • 签证/公民身份信息 • 工作绩效/职业发展信息
员工分析与报告	预测人力资本需求，管理有关员工信息的指标。	<ul style="list-style-type: none"> • 薪酬信息 • 机会和包容性数据 • 员工敬业度调查 • 雇佣信息 • 工作信息 • 个人联系信息
不动产设施管理	管理所有固定设施并提供运营支持，包括租赁、占用和空间支持服务以及能源管理，以及采购和处置设施、提供区域监督和管理建筑项目。	<ul style="list-style-type: none"> • 工作信息 • 计时/考勤/请假数据（即请假状态和轮班（1、2、3班），以用于空间管理） • 签名

		<ul style="list-style-type: none"> • 刷卡门禁数据
安保，安全和健康运作	与物理保障措施的安置、维护、监测、管理和报告有关的活动，以确保设施、员工、客户和顾客的安保和安全。	<ul style="list-style-type: none"> • 意外及事故报告 • 雇佣信息 • 照片/视频/录音 • 您提供的关于家庭和朋友的信息（紧急联系人信息） • 工作信息 • 刷卡门禁数据 • 必要的健康信息，以促进职员和我们设施访客的健康和安全
企业支持服务	支持业务和运营需求，包括企业通信、邮件服务、文件销毁以及企业招待和差旅。	<ul style="list-style-type: none"> • 商旅信息 • 工作信息 • 个人联系信息 • 照片（例如，在 Skype、电子邮箱、以及其他个性化应用中使用的联系人照片）
权限和身份管理	管理内部和外部技术基础设施权限。	<ul style="list-style-type: none"> • 雇佣信息 • 地理位置信息、GPS 信息、IP 地址信息 • 照片/视频/录音 • 工作信息 • 技术信息 • 保密的唯一识别信息（即用于认证的生日信息）
技术基础设施和运营管理	运行和维护托管应用程序的技术基础设施，包括所有计算平台的硬件、操作系统、物理设备和网络连接，还包括影响运行的事件管理流程。	<ul style="list-style-type: none"> • 雇佣信息 • 工作信息 • 技术信息
信息安全，隐私以及网络威胁和事件管理	监测和管理信息安全、隐私和网络威胁及事件。	<ul style="list-style-type: none"> • 除非受到适用法律的限制，否则“我们可能收集的个人数据类别”中列出的任何信息以及位置信息（地理位置信息、GPS 信息、IP 地址信息）均可根据相关《信息安全监控通知》用于该目的。
商业连续性，弹性和应对	制定、维护和测试计划，以从自然或人为造成的企业运营能力中断中恢复。	<ul style="list-style-type: none"> • 您提供的关于家庭和朋友的信息（紧急联系人信息）

		<ul style="list-style-type: none"> • 工作信息 • 个人联系信息
营销策略	确定营销战略和细分市场、广告策略、促销活动、公开宣传和跨渠道（包括社交媒体）分发营销材料。	<ul style="list-style-type: none"> • 照片/视频/录音 • 工作信息
管理顾客和客户关系	通过运营会议、确定销售机会、提供服务和/或管理投资组合来管理客户关系。	<ul style="list-style-type: none"> • 照片/视频/录音 • 工作信息
商旅，会议服务和活动	通过第三方为法律实体或组织提供的商旅、会议服务和活动开展与统一化或分地区的战略和业务制定和管理相关活动。	<ul style="list-style-type: none"> • 商旅信息 • 薪酬信息 • 保密的唯一识别信息 • 金融账户信息（员工费用报销） • 照片/视频/录音 • 您提供的关于家庭和朋友的信息（如果他们参加活动） • 工作信息 • 个人联系信息 • 签名 • 技能和资质 • 税务信息 • 远程或线下活动数据 • 签证/公民身份信息
管理社会责任：活动	根据法律实体或组织的目标和地域要求，管理企业社会责任计划，包括管理志愿者和捐赠计划。	<ul style="list-style-type: none"> • 金融账户信息（自愿工资缴扣） • 工作信息 • 照片/视频 • 远程或线下活动数据
员工注册、执照及认证	与获取（文件证据）专业证书（注册、执照和认证）有关的活动，确保这些证书是最新的且符合适用的法律法规。	<ul style="list-style-type: none"> • 保密的唯一识别信息 • 雇佣信息 • 工作信息 • 逮捕和犯罪记录，法院/法律文件 • 外部业务活动 • 证券和股票交易 • 技能和资质 • 个人联系信息
	遵守注册要求	<ul style="list-style-type: none"> • 指纹采集（仅限适用的国家）
重新进行背景调查	出于监管目的（如挑选适当人选、颁发执照与注册）的需要，对现有员工重新进行背景调查。	<ul style="list-style-type: none"> • 保密的唯一识别信息 • 逮捕和犯罪记录，法院/法律文件

		<ul style="list-style-type: none"> • 外部业务活动 • 个人联系信息 • 签名 • 技能和资质 • 税务信息 • 工作资格状态
管理合规和业务风险	与管理合规、运营、第三方、声誉和战略风险有关的流程。	<ul style="list-style-type: none"> • 除非受到适用法律的限制，否则“我们可能收集的个人信息类别”中列出的任何信息均可用于该目的。
	监督和管理受监管员工遵守适用法律、法规、规章和公司政策的情况。	<ul style="list-style-type: none"> • 除非受到适用法律的限制，否则“我们可能收集的个人信息类别”中列出的任何信息均可用于该目的。
	评估《外部业务活动--企业政策》规定的遵守情况，并评估实际或预期的利益冲突。	<ul style="list-style-type: none"> • 外部业务活动信息
	评估对员工投资监控规定的遵守情况，并评估实际或预期的利益冲突。	<ul style="list-style-type: none"> • 员工投资信息
监管关系和检查	管理监管关系和检查	<ul style="list-style-type: none"> • 除非受到适用法律的限制，否则“我们可能收集的个人信息类别”中列出的任何信息均可用于该目的。
非金融相关的监管报告	管理非金融相关报告的制作和分发，以满足监管要求。	
举报调查	审查举报人提供的个人信息和在对举报问题进行调查时收集的信息，以及所需的任何后续行动	
法律支持	提供业务支持所需的法律建议和咨询，并公布所有法律和税务报告要求。	
内部审计	对公司的内部控制进行独立评估。	

我们可能收集、使用、传输和披露的个人数据的类别，除非受适用法律限制：

- **意外及事故报告**（敏感个人信息）
- **员工投资信息：**员工和/或员工关联人（家庭成员，如配偶、同居伴侣或与员工同住的子女，或在经济上依赖于员工的任何其他人士）的个人投资账户详情，以确保其符合适用的法律和法规。包括：投资公司名称、投资账号、投资账户交易报告或报表，以及证券和股票交易活动。
- **逮捕和犯罪记录，法院/法律文件**
- **福利记录：**福利的登记和管理，如医疗保险、人寿保险、报销信息、家庭/婚姻状况、受抚养人信息、医疗住宿、租车信息（仅限适用的国家）
- 用于身份验证的**生物识别技术**和遵守与员工筛选（敏感个人信息）有关的适用法律
- **商旅信息：**签证信息详情、旅行日志及行程单
- **薪酬信息：**过去和现在的报酬、常旅客 ID、基本工资、市场费率、奖金、股票期权和津贴

- **保密的唯一识别信息：**出生日期和地点、出生时的姓氏和其他曾用名、身份证、社会保险号码或其他税务识别码
- **机会和包容性数据：**种族*、民族*、退伍军人身份、年龄、残疾身份、公民身份、性取向*、性别、性别认同和性别表达。（*代表敏感个人信息）在合法的人力资源用途外使用机会和包容性数据将进行匿名化处理。
- **工作违纪和调查记录：**有关提出的任何纪律申诉和/或疑虑、活动以及调查的信息
- **员工敬业度调查：**结果将以匿名形式报告
- **雇佣信息：**雇用日期、解雇详情、查询管理记录、弹性工作申请、员工状况（如良好状态）
- **金融账户信息：**银行账户详情、工资支付和扣款及其他财务信息
- **指纹采集数据（仅限适用的国家）：**相关身份数据（姓名、员工 ID 编号、CRD 编号、出生日期和地点）和其他特征（身高、体重、性别、头发和眼睛颜色（使用三字母代码））。员工签名、雇主生物识别数据（指纹硬拷贝）和种族数据。这可能包括刑事定罪和违法行为数据。
- **健康信息：**与公共卫生或我们的设施和职员安全相关的健康信息（如 COVID 检测结果）
- **您提供的关于家庭和我的朋友的信息：**家属的全名和出生日期、紧急联系方式、通过参加活动的父母或监护人获取的儿童姓名和年龄、参加活动的个人饮食要求、员工子女的出生证明复印件
- **工作信息：**职衔和/或职位以及责任/职责的描述、工作类别、地点、级别/资历、员工身份标识（如个人号码）、部门、业务线和子业务线、当地公司实体名称、成本中心信息、主管/经理/团队领导姓名及联系信息、报告结构、工作联系信息
- **人生事件补充文件：**医疗/诊断文件；个人情况；重返工作岗位文件；死亡证明和死亡抚恤金文件，包括受益人个人联系信息和详细信息；限制令、家庭监护法律/命令；犯罪记录；军事命令和文件；个人保险文件，例如，房屋火灾/飓风损坏报告、健康信息（用于填写适合工作的表格）、包含提供者详细信息（如治疗师姓名）的医疗信息披露、逮捕和刑事文件、法院/法律文件、结婚和离婚证明、信托或遗产文件以及身份证号码、出生证明、疾病证明书。
- **外部业务活动：**外部业务活动与董事职务（如与雇佣相关目的）详情
- **个人联系信息：**地址、电话、电子邮箱
- **照片/视频/录音：**录像、闭路电视、照片、录音/声音数据
- **退休/养老金计划：**与养老金和退休相关的信息
- **证券和股票交易：**活动/经历（如与雇佣相关目的）
- **签名：**包括数字图片与书面副本
- **技能和资质：**入职前推荐信、工作经历、所讲语言、推荐信、学术记录、专业资格和会员资格、专业培训、公司内部培训、执照和证书、财务监管注册、专业领域、一般管理经验、领导行为
- **刷卡门禁数据**
- **人才和继任计划数据：**流动性偏好、分配到人才库的日期、人才库名称和说明、优势和发展需求
- **税务信息：**税收缴款、税收表格
- **技术信息：**用户名和密码、IP 地址、域名、浏览器类型、操作系统点击流数据和系统日志、电子和非电子内容以及您使用本公司系统或在履行本公司职责时创建或制作的文件
- **计时/考勤/请假数据：**轮班和加班数据、缺勤详情（如病假、节假日和请假）
- **远程或线下活动数据：**发言人简历、旅行详情、配偶/伴侣姓名、参加活动者的特殊援助需求、通过父母或监护人获取的儿童姓名和年龄、参加活动者的饮食要求
- **签证/公民身份信息：**工作资格状态、居留权、公民身份、签证详情、护照详情
- **工作绩效/职业发展信息：**评估和评级（结果评级、行为评级、潜力评级）、绩效目标描述、关键能力描述、发展领域、指导笔记、他人反馈（如 360）、自我评估描述、领导审查描述、绩效预期、衡量标准、行动日期、领导进展说明、职业发展信息

我们可能与其分享个人信息的非关联第三方的类别

在适用法律允许的范围内，并在实现本通知所述目的的适当情况下，本公司可根据下表或本通知第 XI 节的特定司法管辖区条款（若适用）披露下表所列的个人数据。

接收方类型	个人信息类型
<p>专业顾问： 会计师、审计师、律师、保险公司、银行业者、税务顾问，以及本公司经营业务所在的所有国家的其他外部专业顾问。</p> <p>服务提供商： 在本公司运营所在国家为本公司提供产品和服务的公司，比如工资、合作伙伴银行、养老金计划、福利提供商；为公司向其客户分销的投资产品提供建议或资助的资产管理公司；人力资源服务、招聘和培训提供商；绩效管理、培训、费用管理、IT 系统供应商和支持；接待和安保、餐饮和物流服务提供商、翻译服务、协助组织活动和营销的第三方、医疗或健康从业员、行业团体和协会、不动产管理，以及其他服务提供商。</p> <p>注：在适当的情况下，本公司将提供和接受合理的第三方（例如服务提供商）协助，以回应数据主体的访问请求。</p>	<p>除非受到适用法律的限制，否则个人信息将在专业顾问和服务提供商提供与上表所列目的相符的服务的范围内与他们共享。与专业顾问和服务提供商共享的个人信息类别与他们为本公司提供的服务相符，包括：</p> <ul style="list-style-type: none">• 意外及事故报告• 福利记录• 商旅信息• 薪酬信息• 保密的唯一识别信息• 机会和包容性数据• 工作违纪和调查记录• 雇佣信息• 金融账户信息• 健康信息• 照片/视频/录音• 您提供的关于家庭和朋友的信息• 工作信息• 外部业务活动• 个人联系信息• 退休/养老金计划• 证券和股票交易• 签名• 技能和资质• 刷卡门禁数据• 人才和继任计划数据• 税务信息• 技术信息• 计时/考勤/请假数据• 远程或线下活动数据• 签证/公民身份信息• 工作绩效/职业发展信息
<p>公共和政府机构： 在本公司经营业务所在的国家监管本公司或对本公司拥有司法管辖权的实体，比如监管机构、执法机构、公共机构、许可和注册机构、司法机构以及上述机构指定的第三方。</p>	<ul style="list-style-type: none">• 意外及事故报告• 商旅信息• 薪酬信息• 机会和包容性数据（汇总数据）• 工作违纪和调查记录• 雇佣信息• 指纹采集数据（仅限适用的国家）

	<ul style="list-style-type: none"> • 健康信息（汇总数据） • 照片/视频/录音 • 工作信息 • 外部业务活动 • 退休/养老金计划 • 证券和股票交易 • 签名 • 技能和资质 • 税务信息（汇总数据） • 计时/考勤/请假数据 • 签证/公民身份信息
与公司交易有关的各方： 与任何提议或实际重组、合并、出售、合资、分配、转让或对全部或部分本公司业务、资产或股票（包括与任何破产或类似诉讼有关）进行其他处置有关的第三方，例如证券交易所和商业交易对手	<ul style="list-style-type: none"> • 薪酬信息 • 保密的唯一识别信息 • 雇佣信息 • 工作信息 • 技能和资质 • 人才和继任计划数据 • 远程或线下活动数据 • 签证/公民身份信息 • 工作绩效/职业发展信息
工会： 员工所属工会。	<ul style="list-style-type: none"> • 雇佣信息 • 工作信息 • 技能和资质
当前和潜在客户与顾客。	<ul style="list-style-type: none"> • 照片/视频/录音 • 工作信息
活动供应商： 活动供应商、组织者、演讲人、志愿者、短期合同工和促成活动的主办者	<ul style="list-style-type: none"> • 商旅信息 • 照片/视频/录音 • 您提供的关于家庭和朋友的信息（如果他们参加活动） • 工作信息 • 个人联系信息 • 远程或线下活动数据
在线追踪供应商： 改进我们网站和平台的技术和设计功能	<ul style="list-style-type: none"> • IP 地址

附录 B - 短期合同工

“我们”或“我们的”指的是作为数据控制者的美国银行法律实体；“您”或“您的”指的是短期合同工。

下表包含了我们可能处理您的个人数据的目的、可能进行的处理活动类型以及用于此类处理的个人信息类型。表格下方列出了有关个人信息类型的更多信息。

目的	处理活动举例	个人信息类型
支付，薪酬	设计并提供短期合同工薪酬。	<ul style="list-style-type: none"> • 保密的唯一识别信息 • 雇佣信息 • 金融账户信息 • 您提供的关于家庭和朋 友的信息（家属） • 工作信息 • 个人联系信息 • 签名 • 技能和资质 • 税务信息 • 计时/考勤/请假数据 • 签证/国籍信息
员工学习	通过需求评估、部署和提供学习 解决方案以及技能应用和考核， 培养员工所需的技能。	<ul style="list-style-type: none"> • 雇佣信息 • 照片/视频/录音 • 个人联系信息 • 工作信息 • 技能和资质 • 计时/考勤/请假数据（即 请假状态） • 远程或线下活动数据
员工支持	劳工关系、搬迁、移民、与搬迁 相关的税务申报、提升薪酬的解 决方案，以及人力资源工具和信 息支持。	<ul style="list-style-type: none"> • 商旅信息 • 机会和包容性数据 • 工作违纪和调查记录 • 雇佣信息 • 工作信息 • 外部业务活动 • 个人联系信息 • 签名 • 技能和资质 • 刷卡门禁数据 • 税务信息计时/考勤/请假 数据 • 签证/公民身份信息
劳动力分析与报告	预测人力资本需求，管理有关劳 动力信息的指标。	<ul style="list-style-type: none"> • 机会和包容性数据 • 雇佣信息 • 工作信息

		<ul style="list-style-type: none"> • 个人联系信息
不动产设施管理	管理所有固定设施并提供运营支持，包括租赁、占用和空间支持服务以及能源管理，以及采购和处置设施、提供区域监督和管理建筑项目。	<ul style="list-style-type: none"> • 工作信息 • 签名 • 刷卡门禁数据
安保，安全和健康运作	与物理保障措施的安置、维护、监测、管理和报告有关的活动，以确保设施、员工、客户和顾客的安保和安全。	<ul style="list-style-type: none"> • 意外及事故报告 • 雇佣信息 • 照片/视频/录音 • 您提供的关于家庭和朋友的信息（紧急联系人信息） • 工作信息 • 刷卡门禁数据 • 必要的健康信息，以促进员工和我们设施访客的健康和安全
企业支持服务	支持业务和运营需求，包括企业通信、邮件服务、文件销毁以及企业招待和差旅。	<ul style="list-style-type: none"> • 商旅信息 • 工作信息 • 个人联系信息 • 照片（例如，在 Skype、电子邮箱、以及其他个性化应用中使用的联系人照片）
权限和身份管理	管理内部和外部技术基础设施权限。	<ul style="list-style-type: none"> • 雇佣信息 • 地理位置信息、GPS 信息、IP 地址信息 • 照片/视频/录音 • 工作信息 • 技术信息 • 保密的唯一识别信息（即用于认证的生日信息）
技术基础设施和运营管理	运行和维护托管应用程序的技术基础设施，包括所有计算平台的硬件、操作系统、物理设备和网络连接，还包括影响运行的事件管理流程。	<ul style="list-style-type: none"> • 雇佣信息 • 工作信息 • 技术信息
信息安全，隐私以及网络威胁和事件管理	监测和管理信息安全、隐私和网络威胁及事件。	<ul style="list-style-type: none"> • 除非受到适用法律的限制，否则“我们可能收集的个人数据类别”中列出的任何信息以及位置信息（地理位置信息、GPS 信息、IP 地址信息）均可根据相关《信息安全监控通知》用于该目的。

商业连续性，弹性和应对	制定、维护和测试计划，以从自然或人为造成的企业运营能力中断中恢复。	<ul style="list-style-type: none"> • 您提供的关于家庭和朋友的信息（紧急联系人信息） • 工作信息 • 个人联系信息
营销策略	确定营销战略和细分市场、广告策略、促销活动、公开宣传和跨渠道（包括社交媒体）分发营销材料。	<ul style="list-style-type: none"> • 照片/视频/录音 • 工作信息
管理顾客和客户关系	通过运营会议、确定销售机会、提供服务和/或管理投资组合来管理客户关系。	<ul style="list-style-type: none"> • 照片/视频/录音 • 工作信息
商旅，会议服务和活动	通过第三方为法律实体或组织提供的商旅、会议服务和活动开展与统一化或分地区的战略和业务制定和管理相关活动。	<ul style="list-style-type: none"> • 商旅信息 • 保密的唯一识别信息 • 照片/视频/录音 • 您提供的关于家庭和朋友的信息（如果他们参加活动） • 工作信息 • 个人联系信息 • 签名 • 税务信息 • 远程或线下活动数据 • 签证/公民身份信息
员工注册、执照及认证	与获取（文件证据）专业证书（注册、执照和认证）有关的活动，确保这些证书是最新的且符合适用的法律法规。	<ul style="list-style-type: none"> • 保密的唯一识别信息 • 雇佣信息 • 工作信息 • 外部业务活动 • 证券和股票交易 • 技能和资质
	遵守注册要求	<ul style="list-style-type: none"> • 指纹采集（仅限适用的国家）
管理合规和业务风险	与管理合规、运营、第三方、声誉和战略风险有关的流程。	<ul style="list-style-type: none"> • 除非受到适用法律的限制，否则“我们可能收集的个人数据类别”中列出的任何信息均可用于该目的。
	监督和管理受监管员工遵守适用法律、法规、规章和公司政策的情况。	<ul style="list-style-type: none"> • 除非受到适用法律的限制，否则“我们可能收集的个人数据类别”中列出的任何信息均可用于该目的。
	评估《外部业务活动--企业政策》规定的遵守情况，并评估实际或预期的利益冲突。	<ul style="list-style-type: none"> • 外部业务活动信息

	评估对员工投资监控规定的遵守情况，并评估实际或预期的利益冲突。	<ul style="list-style-type: none"> 员工投资信息
监管关系和检查	管理监管关系和检查	<ul style="list-style-type: none"> 除非受到适用法律的限制，否则“我们可能收集的个人数据类别”中列出的任何信息均可用于该目的。
非金融相关的监管报告	管理非金融相关报告的制作和分发，以满足监管要求。	
举报调查	审查举报人提供的个人信息和在对举报问题进行调查时收集的信息，以及所需的任何后续行动。	
法律支持	提供业务支持所需的法律建议和咨询，并公布所有法律和税务报告要求。	
内部审计	对公司的内部控制进行独立评估。	

我们可能收集、使用、传输和披露的个人数据的类别，除非受适用法律限制：

- **意外及事故报告**（敏感个人信息）
- **员工投资信息**：员工和/或员工关联人（家庭成员，如配偶、同居伴侣或与员工同住的子女，或在经济上依赖于员工的任何其他人员）的个人投资账户详情，以确保其符合适用的法律和法规。包括：投资公司名称、投资账号、投资账户交易报告或报表，以及证券和股票交易活动。
- 用于身份验证的**生物识别技术**和遵守与员工筛选（敏感个人信息）有关的适用法律
- **商旅信息**：签证信息详情、常旅客 ID、旅行日志及行程单
- **保密的唯一识别信息**：出生日期和地点、出生时的姓氏和其他曾用名、身份证、社会保险号码或其他税务识别码
- **机会和包容性数据**：种族*、民族*、退伍军人身份、年龄、残疾身份、公民身份、性取向*、性别、性别认同和性别表达。（*代表敏感个人信息）在合法的人力资源用途外使用机会和包容性数据将进行匿名化处理。
- **工作违纪和调查记录**：有关提出的任何纪律申诉和/或疑虑、活动以及调查的信息
- **雇佣信息**：雇用日期、解雇详情、查询管理记录、弹性工作申请
- **金融账户信息**：银行账户详情、工资支付和扣款及其他财务信息
- **指纹采集数据**（仅限适用的国家）：相关身份数据（姓名、员工 ID 编号、CRD 编号、出生日期和地点）和其他特征（身高、体重、性别、头发和眼睛颜色（使用三字母代码））。员工签名、雇主生物识别数据（指纹硬拷贝）和种族数据。这可能包括刑事定罪和违法行为数据。
- **健康信息**：与公共卫生或我们的设施和员工安全相关的健康信息（如 COVID 检测结果）
- **您提供的关于家庭和朋友的联系信息**：紧急联系方式、通过参加活动的父母或监护人获取的儿童姓名和年龄、参加活动的个人饮食要求
- **工作信息**：职衔和/或职位以及责任/职责的描述、同类工作、地点、级别/资历、员工身份标识、部门、业务线和子业务线、当地公司实体名称、成本中心信息、主管/经理/团队领导姓名及联系信息、报告结构、工作联系信息
- **外部业务活动**：外部业务活动与董事职务（如与雇佣相关目的）详情
- **个人联系信息**：地址、电话、电子邮箱
- **照片/视频/录音**：录像、闭路电视、照片、录音/声音数据
- **证券和股票交易**：活动/经历（如与雇佣相关目的）
- **签名**：包括数字图片与书面副本
- **技能和资质**：入职前推荐信、工作经历、所讲语言、推荐信、学术记录、专业资格和会员资格、专业培训、公司内部培训、执照和证书、财务监管注册、专业领域、一般管理经验、领导行为
- **刷卡门禁数据**

- **技术信息：**用户名和密码、IP 地址、域名、浏览器类型、操作系统点击流数据和系统日志、电子和非电子内容以及您使用本公司系统或在履行本公司职责时创建或制作的文件
- **计时/考勤/请假数据：**轮班和加班数据、缺勤详情（如病假、节假日和请假）
- **远程或线下活动数据：**发言人简历、旅行详情、配偶/伴侣姓名、参加活动者的特殊援助需求、通过父母或监护人获取的儿童姓名和年龄、参加活动者的饮食要求
- **签证/公民身份信息：**工作资格状态、居留权、公民身份、签证详情、护照详情

我们可能与其分享个人信息的非关联第三方的类别

在适用法律允许的范围内，并在实现本通知所述目的的适当情况下，本公司可根据下表或本通知第 XI 节的特定司法管辖区条款（若适用）披露下表所列的个人数据。本公司可以向第三方提供同意，供其按下述规定处理员工和短期合同工个人信息。

接收方类型	个人信息类型
<p>专业顾问：会计师、审计师、律师、保险公司、银行业者、税务顾问，以及本公司经营业务所在的所有国家的其他外部专业顾问。</p> <p>服务提供商：在本公司运营所在国家为本公司提供产品和服务的公司，比如福利提供商；为公司向其客户分销的投资产品提供建议或资助的资产管理公司；人力资源服务、招聘和培训提供商；培训、费用管理、IT 系统供应商和支持；接待和安保、餐饮和物流服务提供商、翻译服务、协助组织活动和营销的第三方、行业团体和协会，不动产管理，以及其他服务提供商包括您的雇主或本公司（如适用）</p> <p>注：在适当的情况下，本公司将提供和接受合理的第三方（例如服务提供商）协助，以回应数据主体的访问请求。</p>	<p>除非受到适用法律的限制，否则个人信息将在专业顾问和服务提供商提供与上表所列目的相符的服务的范围内与他们共享。与专业顾问和服务提供商共享的个人信息类别与他们为本公司提供的服务相符，包括：</p> <ul style="list-style-type: none"> • 意外及事故报告 • 商旅信息 • 保密的唯一识别信息 • 机会和包容性数据 • 工作违纪和调查记录 • 雇佣信息 • 金融账户信息 • 健康信息 • 照片/视频/录音 • 您提供的关于家庭和朋友的信息 • 工作信息 • 外部业务活动 • 个人联系信息 • 证券和股票交易 • 签名 • 技能和资质 • 刷卡门禁数据 • 技术信息 • 计时/考勤/请假数据 • 远程或线下活动数据 • 签证/公民身份信息
<p>公共和政府机构：在本公司经营业务所在的国家监管本公司或对本公司拥有司法管辖权的实体，比如监管机构、执法机构、公共机构、许可和注册机构、司法机构以及上述机构指定的第三方。</p>	<ul style="list-style-type: none"> • 意外及事故报告 • 商旅信息 • 薪酬信息 • 机会和包容性数据（汇总数据） • 工作违纪和调查记录 • 雇佣信息 • 指纹采集数据（仅限适用的国家）

	<ul style="list-style-type: none"> • 健康信息（汇总数据） • 照片/视频/录音 • 工作信息 • 外部业务活动 • 证券和股票交易 • 签名 • 技能和资质 • 税务信息（汇总数据） • 计时/考勤/请假数据 • 签证/公民身份信息
与公司交易有关的各方： 与任何提议或实际重组、合并、出售、合资、分配、转让或对全部或部分本公司业务、资产或股票（包括与任何破产或类似诉讼有关）进行其他处置有关的第三方，例如证券交易所和商业交易对手	<ul style="list-style-type: none"> • 薪酬信息 • 保密的唯一识别信息 • 雇佣信息 • 工作信息 • 技能和资质 • 远程或线下活动数据 • 签证/公民身份信息
工会： 短期合同工所属工会。	<ul style="list-style-type: none"> • 雇佣信息 • 工作信息 • 技能和资质
当前和潜在客户与顾客。	<ul style="list-style-type: none"> • 照片/视频/录音 • 工作信息
活动供应商： 活动供应商、组织者、演讲人、志愿者、短期合同工和促成活动的主办者。 短期合同工不得参加任何活动，除非该活动与工作任务直接相关。	<ul style="list-style-type: none"> • 商旅信息 • 照片/视频/录音 • 您提供的关于家庭和朋友的信息（如果他们参加活动） • 工作信息 • 个人联系信息 • 远程或线下活动数据
在线追踪供应商： 改进我们网站和平台的技术和设计功能	<ul style="list-style-type: none"> • IP 地址

附录 C

我们可能向其披露个人数据的组织

关于权利的详细信息包含在通知的“个人数据的访问、可转移性、纠正和抑制、处理限制和约束及准确性”章节

境内接收方			
名称	联系方式	处理目的及方式	个人数据类型
中国国际技术智力合作集团有限公司	Yong, Guangming 先生 gastuyong@ciicsh.com +8621 3397 2334	薪资和薪酬处理；遵守当地或外国州和/或国家/地区的特定税收和移民法律法规以及薪资报告，不限于但包括商务旅行；法定福利管理/处理	薪资：居民身份证、银行账户详情、详细地址、税款和社会保险缴款、工资单付款和扣款及其他财务信息。 法定福利：居民身份证、社会保险卡、居住证、个人联系信息、机会数据（如性别/残疾证明）、党派、学历、工作信息、生育证明、紧急联系人信息、个人电子邮件地址、签名

境外接收方			
名称	联系方式	处理目的及方式	个人数据类型
Bank of America, N.A.	通过电子邮件 hrsc.apac@bofa.com 或 电话 00800.2722.4772 或 +65.6591.1166 联系 人力资源服务中心	分级管理、内部晋升、绩效考核、进行内外部沟通协调、开展日常业务和办公工作。 Bank of America, N.A. 可能会根据本通知在人力资源管理所需的范围内接收、存储、处理和删除中国员工的数据，并且不会将这些数据用于本通知未列明的其他目的。	员工： <ul style="list-style-type: none">意外及事故报告福利记录商旅信息薪酬信息保密的唯一识别信息（即用于验证的出生日期）机会和包容性数据机会数据（例如用于规划卫生间设施的性别）员工敬业度调查工作违纪记录雇佣信息金融账户信息（员工费用报

			<p>销，自愿工资缴扣）</p> <ul style="list-style-type: none"> • 必要的健康信息，以促进员工和我们的设施访客的健康和安全 • 您提供的关于家庭和朋友的信 息：家属、紧急联系人（如果他们参加活动） • 工作信息 • 生活事件文档（逮捕和犯罪记录，法院/法律文件） • 外部业务活动 • 个人联系信息 • 照片/视频/录音 • 退休/养老金计划 • 证券和股票交易 • 签名 • 技能和资质 • 刷卡门禁数据 • 人才和继任计划数据 • 税务信息 • 技术信息 • 计时/考勤/请假数据（即请假状态） • 远程或线下活动数据 • 签证/公民身份信息 • 工作资格状况 • 工作绩效/职业发展信息 <p>短期合同工：</p> <ul style="list-style-type: none"> • 意外及事故报告 • 商旅信息 • 薪酬信息 • 保密的唯一识别信息（即用于验证的出生日期）
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			<ul style="list-style-type: none">• 机会和包容性数据• 工作违纪记录• 雇佣信息• 金融账户信息• 必要的健康信息，以促进职员和我们的设施访客的健康和安全• 您提供的关于家庭和朋友的信 息：家属、紧急 联系人（如果他们参与活动）• 工作信息• 外部业务活动• 个人联系信息• 照片/视频/录音• 证券和股票交易• 签名• 技能和资质• 刷卡门禁数据• 技术信息• 计时/考勤/请假 数据（即请假状态）• 远程或线下活动 数据• 签证/公民身份 信息
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