

**ALUMNI NETWORK WEBSITE DATA PROTECTION NOTICE**

Effective: May 1, 2025

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

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

The legal entity, Bank of America, National Association, has prepared this Alumni Network Website Data Protection Notice ("Notice") 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 or mobile application. 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.

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.

Please access the following link for Data Protection Notices in languages other than English:

[ALUMNI NETWORK WEBSITE DATA PROTECTION NOTICE](#)

[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. In addition, data collected while you were an employee at the Company may be leveraged by the Alumni network. 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

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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. 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.

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

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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 unauthorized 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 their 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.
- rights related to automated decision making

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

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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.

Any maximum storage term set forth by applicable law will prevail. The Company will delete Personal Data after the applicable retention period.

| Jurisdiction (Country) | Personal Data Retention Period |
|------------------------|--------------------------------|
| All Countries          | Active Use +3 Years            |

## VIII. QUESTIONS

Should any Alumni have any questions, concerns or complaints about this Notice, please contact the Data Protection Officer using the contact details below. For individual rights, please contact the Alumni Program via email: [alumni.network@bofa.com](mailto:alumni.network@bofa.com) or please contact the Human Resources Service Center via [hrsc.apac@boa.com](mailto:hrsc.apac@boa.com) or by phone at 00800.4772.4772 or 65.6591.1166 .

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:

APAC Jurisdictions: [DPO@bofa.com](mailto: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

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**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.

## 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.

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 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

## **Appendix A - Alumni**

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

\*Personal Data marked with an asterisk in the Section above is mandatory for Alumni to provide directly to the Company. It is voluntary for Alumni to provide other types of Personal Data and information about themselves. The Alumni Program Team may append or revise the following Personal Data points based on Bank of America's Global Human Resource records (for instance, if a person number has been entered by the member and it has two numbers inverted or this field is left blank, this will be corrected by the Alumni Program Team for data accuracy purposes. The following personal data categories may be inputted indirectly. Some of the personal data listed above may be shared, collected, used, transferred and/or disclosed in-line with country specific laws/regulations.

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### Indirect data collected during your employment with the Company:

- **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.

### 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:              | <b>Personal Details:</b> Name*, Profile Photo, Current Location*, Postal Address, State*<br><b>Professional Details:</b> Employment Status*, Current Company* and Industry<br><b>Contact Information:</b> 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<br><br><a href="#">Bank of America Locations</a> |

### 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<br>Enterprise Alumni | Owen Geddes, COO Enterprise Alumni,<br><a href="mailto:owen.geddes@enterprisealumni.com">owen.geddes@enterprisealumni.com</a> | <p>Vendor platform uses data to provide metrics and reporting back to Bank of America to administer the Bank of America Alumni Network program.</p> <p>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.</p> | <p>Alumni – Former Employee</p> <p><b>Required Fields</b></p> <ul style="list-style-type: none"> <li>• First and last name</li> <li>• Current city of residence</li> <li>• Current state of residence</li> <li>• Current employment status</li> <li>• Years employed at Bank of America</li> <li>• Most recent line of business</li> <li>• Most recent bank office location</li> </ul> <p><b>Optional Fields</b></p> <ul style="list-style-type: none"> <li>• Mailing address</li> <li>• Phone number</li> <li>• Country of residence indicator</li> <li>• Employee ID and Person number</li> <li>• Interest in employee groups</li> <li>• Interest in community service</li> <li>• Personal profile photo</li> <li>• Board memberships and roles</li> <li>• Education information</li> <li>• Skills &amp; certifications</li> <li>• Languages spoken</li> <li>• Current employment industry</li> <li>• Name of most recent manager</li> <li>• Personal contact information</li> <li>• Social media handles</li> </ul> |

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| Name                        | Contact Information                                                                                                      | Processing Purpose and Method                                                                                                                                                                                                                                                                                                                                                                                                                                  | Category of Personal Data                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bank of America Corporation | Human Resources, Bank of America Alumni Network via <a href="mailto:alumni.network@bofa.com">alumni.network@bofa.com</a> | <p>Alumni program management, including validation of membership eligibility, program metrics, access to alumni benefit programs, and to carry out daily business and office work.</p> <p>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.</p> | <p>Alumni – Former Employee</p> <p><b>Required Fields</b></p> <ul style="list-style-type: none"> <li>• First and last name</li> <li>• City of current residence</li> <li>• Current employment status</li> <li>• Current company</li> <li>• Years employed at Bank of America</li> <li>• Most recent line of business</li> <li>• Most recent bank office location</li> </ul> <p><b>Optional Fields</b></p> <ul style="list-style-type: none"> <li>• Mailing address</li> <li>• Phone number</li> <li>• Country of residence indicator</li> <li>• Employee ID and Person number</li> <li>• Interest in employee groups</li> <li>• Interest in community service</li> <li>• Personal profile photo</li> <li>• Board memberships and roles</li> <li>• Education information</li> <li>• Skills &amp; certifications</li> <li>• Languages spoken</li> <li>• Current employment industry</li> <li>• Name of most recent manager</li> <li>• Personal contact information</li> <li>• Social media handles</li> </ul> |

## 校友会网站数据保护通知

生效日：2025 年 5 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**”）由法律实体美国银行有限公司编制，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或移动应用程序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。

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）。

请通过以下链接访问英文以外的其他语言的资料保护通知：[校友会网站资料保护通知](#)

### 二、个人数据收集和使用目的

为加入校友会网站，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数据。本通知[附录 A](#) 中所列是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）。我们从您以及其他来源收取个人数据，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。

我们收集和处理与您有关的个人数据：(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数据，(vi) 必要时，我们对个人数据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数据，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

本公司使用的某些网站和移动应用程序上会收集非必要 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数据，请参见第六节。

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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。可通过本通知“问题”条款中所述的联系信息提出要求提供美国银行有限公司集团的关联企业名单。

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）：

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- 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此类个人数据；
- 与自动化决策相关的权利。

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。

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。

| 司法管辖区 (国家) | 个人数据保留期限  |
|------------|-----------|
| 所有国家       | 活跃使用 +3 年 |

## 八、问题

如果任何校友对本通知有任何疑问、疑虑或投诉，请使用以下联系方式与数据保护官联系。有关个人权利，请发送电子邮件联系校友计划部门：[alumni.network@bofa.com](mailto:alumni.network@bofa.com)；或通过 [hrsc.apac@boa.com](mailto:hrsc.apac@boa.com) 联系人力资源服务中心，或致电 00800.4772.4772 或 65.6591.1166。

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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：

亚太地区：[DPO@bofa.com](mailto: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（包括在需要时取得校友同意）合理尽快通知校友。

## 十、司法管辖区特定条款

**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者身份（即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）向其传输个人数据的组织以及中国境外的其他接收方的名单，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、福利及保险管理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，包括本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。

## 关于本通知的同意

我已阅读“校友会网站数据保护通知”，该通知描述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。

我确认，在向本公司提供其他人的任何个人数据之前（如适用），我已向此类人士充分提供本通知所述的全部信息，以解释如何处理他们的个人数据及其相关权利，并且我已获得此类人士的明确同意（如适用，包括书面同意或单独同意），以便在必要时处理其个人数据。

请参阅说明了解如何同意本通知。

请检查（如适用）、签署、扫描已签字的副本，并提交给您当地的人力资源团队。

### 中国：

☐ 本公司将按本通知所述方式处理个人数据，并遵守超级链接的《Cookie 政策》中进一步指定的处理方式。我同意这种使用。

☐ 如本通知的“披露”和“司法管辖区特定条款”两节所述，本公司将把个人数据转移给中国**境内**的第三方。我同意这种转移。

☐ 如本通知的“披露”和“司法管辖区特定条款”两节所述，本公司将把个人数据转移给中国**境外**的第三方。我同意这种转移



## 附录 A —校友

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"> <li>进行注册以及对校友帐户和相关客户服务进行验证</li> <li>为参加校友会计划和网络捐款提供便利</li> <li>举办招聘活动，实现人才管理</li> <li>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</li> <li>提供与美国银行产品、金融服务和福利相关的要约</li> <li>从校友会团队发送消息</li> <li>促进校友之间的自发联络、社交和人脉沟通</li> <li>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</li> <li>实现美国银行及其校友会的其他业务目的</li> <li>为诈骗防范和安全保障目的实施监控，预防网络攻击</li> <li>履行法律和监管义务</li> </ul> | <ul style="list-style-type: none"> <li><b>个人详细信息：</b>姓名*、个人资料照片、当前地址*、邮寄地址、州*</li> <li><b>专业详细信息：</b>就业状况*、当前公司*和行业</li> <li><b>联系信息：</b>电子邮件地址*、LinkedIn 个人资料、电话号码</li> <li><b>在美国银行的工作经历：</b>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*、美国银行办事处国家、职级、公司职衔、最近经理姓名、美国银行标准 ID (NBK ID)、美国银行人员编号</li> <li>金融账户信息</li> <li>退休/养老金计划信息</li> <li><b>可选问题：</b>感兴趣的员工团体/人际网络、感兴趣的社区服务区域</li> </ul> | 同意 <ul style="list-style-type: none"> <li>获得使用数据以注册校友会（包括为注册、支持和服务）的同意</li> <li>撤销同意不会影响在撤销前基于此同意所做操作的合法性。</li> </ul> |

\*本部分标有星号的个人数据是校友必须直接向本公司提供的。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。校友计划团队可根据美国银行的全球人力资源记录附加或修改以

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下个人数据点（例如，如果一项人员编号由会员输入且有两个数字顺序颠倒或此字段被留空，这将由校友计划团队为数据准确性之目的所更正。以下个人数据类型可被直接录入。以上所列的部分个人数据，可能会按照国家的特定法律/法规，予以分享、收集、使用、传输及/或披露。

在您任职于本公司期间内所收集的间接数据

- **工作信息：**工作职衔和/或职位以及工作职责的描述、职业类别、地点、职级/资历、雇员识别符（例如，人员编号）、部门、业务线和分支线、当地公司主体名称、成本中心信息、主管/经理/团队领导名字

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： | <b>个人详细信息：</b> 姓名*、个人资料照片、当前地址*、邮寄地址、州*<br><b>专业详细信息：</b> 就业状况*、当前公司*和行业<br><b>联系信息：</b> 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<br><a href="#">美国银行地点</a> |

附录 B

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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| EnterpriseJungle, 其经营别称为企业校友 | Owen Geddes, 企业校友首席运营官, 电子邮箱:<br><a href="mailto:owen.geddes@enterprisealumni.com">owen.geddes@enterprisealumni.com</a> | <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><b>必填字段</b></p> <ul style="list-style-type: none"> <li>• 名字和姓氏</li> <li>• 当前居住城市</li> <li>• 当前居住国家</li> <li>• 当前就业状况</li> <li>• 当前公司</li> <li>• 在美国银行工作的年限</li> <li>• 最近的业务线</li> <li>• 最近的银行办公地点</li> </ul> <p><b>可选字段</b></p> <ul style="list-style-type: none"> <li>• 邮寄地址</li> <li>• 电话号码</li> <li>• 居住国家标识</li> <li>• 员工 ID 和人员编号</li> <li>• 感兴趣的员工群体</li> <li>• 感兴趣的社区服务</li> <li>• 个人资料照片</li> <li>• 委员会成员和角色</li> <li>• 教育信息</li> <li>• 技能与证书</li> <li>• 所说的语言</li> <li>• 当前就业行业</li> <li>• 最近经理的姓名</li> <li>• 个人联系信息</li> <li>• 所用社交媒体</li> </ul> |
| 美国银行公司                       | 人力资源部, 美国银行校友会, 电子邮箱:<br><a href="mailto:alumni.network@bofa.com">alumni.network@bofa.com</a>                           | <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><b>必填字段</b></p> <ul style="list-style-type: none"> <li>• 名字和姓氏</li> <li>• 当前居住城市</li> <li>• 当前就业状况</li> <li>• 当前公司</li> <li>• 在美国银行工作的年限</li> <li>• 最近的业务线</li> <li>• 最近的银行办公地点</li> </ul> <p><b>可选字段</b></p> <ul style="list-style-type: none"> <li>• 邮寄地址</li> <li>• 电话号码</li> <li>• 居住国家标识</li> <li>• 员工 ID 和人员编号</li> <li>• 感兴趣的员工群体</li> <li>• 感兴趣的社区服务</li> <li>• 个人资料照片</li> <li>• 委员会成员和角色</li> <li>• 教育信息</li> <li>• 技能与证书</li> <li>• 所说的语言</li> <li>• 当前就业行业</li> <li>• 最近经理的姓名</li> <li>• 个人联系信息</li> <li>• 所用社交媒体</li> </ul>   |