

The Notice

We, Prudential Corporation Asia, take the privacy and protection of your personal information seriously.

So, we've set out below information about our processing of your personal information as a member of staff, what rights you have, and how you can get in touch if you want to know more.

When we say personal information, we mean information about you, such as your name, date of birth and contact details. We collect personal information from you that is necessary for us to either provide you with employment opportunities, benefits, staff administration, Health and Safety or to comply with statutory or contractual requirements. Unfortunately, if you're unable to provide certain personal information, we will not be able to process your application or manage your employee contract.

As with many other Prudential policies, this document is not part of your contract of employment, and we may update it from time to time, for example if we implement new systems or processes that involve the use of personal data.

We may change this Privacy Notice from time to time by updating our Privacy Notice page on our website. We encourage you to check our Privacy Notice from time to time on our website, as the version of our Privacy Notice which is displayed on our website takes precedence over all previous versions of our Privacy Notice.

Part A – Personal information we process

- Personal and contact details, such as title, full name, contact details and contact details history, photo and video recordings;
- Information about your job e.g. job title;
- Pre-employment screening data e.g. credit checks, references, resumes;
- Salary and benefits e.g. base salary and bonus;
- Share plans e.g. number of shares held;
- Time and systems / building access information e.g. building card access;
- Performance, development and disciplinary information e.g. performance rating;
- Absence information e.g. holiday;
- Organisational data e.g. cost centre allocations;
- Identification data e.g. name, employee ID;
- your date of birth, gender and/or age;
- your nationality, Residency and/or citizenship status;
- family members;
- information about your prior employment status;
- your marital status, family, lifestyle or social circumstances. For example, the number of dependents you have or if you are a widow or widower;
- tax information;
- Educational qualifications.

Part B – Where we get your personal information

We'll collect personal information from the following general sources:

- from you directly;
- information generated about you during the course of your application for employment or during the course of your employment with us;
- from a broker or other intermediary (for example, employment agencies and consultancies) who we work with;
- Prudential Group companies;
- Cookies, location services, IP addresses when you visit our website or mobile app;
- CCTV footage at office premises;
- Questionnaire and contact details when you attend surveys or when you update contact us form on our website;
- from other sources such as previous employers, Fraud Prevention Agencies, Credit Reference Agencies, other lenders, publicly available directories and information (for example, telephone directory, social media, internet, news articles), debt recovery and/or tracing agents, other organisations to assist in prevention and detection of crime, police and law enforcement agencies.

Part C - How we use your personal information and why

We, Prudential Corporation Asia, the Prudential Group and our Business Partners, will use the personal information you provide to us, together with other information, for the following purposes:

- Managing your employment and staff administration (including but not limited to) administering payment of your salary and associated benefits;
- performance management;
- managing your attendance and absence;
- managing our workforce;
- dealing with grievances and disciplinary processes;
- fulfilling obligations as required by the authorities or law and all other related purposes;
- managing your pension benefits during and post-employment;
- communicating with you and with other Prudential employees and third parties;
- communicating with your designated contacts in the case of an emergency;
- managing your health & safety at office and during business travel;
- automated decision-making or profiling (see Part E for more); and
- keeping your information on record and carrying out other internal business administration.

In addition, we, Prudential Corporation Asia, the Prudential Group will use the personal information you provide to us, together with other information, to manage resources across the group. Please see part I for further details.

The purposes above are necessary to allow us to perform our contractual obligations to you and to enable us to comply with applicable laws and regulation. We may also rely on legitimate interests in using and sharing your personal information for the purposes described above to manage our businesses. If we need your consent to use your personal information for the purposes described above, we will only process your personal information if you have provided consent.

Who we share your personal information with and why

We'll share your personal information within the Prudential Group and with our Business Partners (e.g. travel agency, healthcare provider, corporate insurer, pension provider), for any of the purposes set out in this Part C. If appropriate, we may also pass on your personal information to financial crime prevention agencies, any legal, future employer, regulatory or government bodies.

We may process your personal information in a country other than the one you are resident in. To the extent we transfer your personal data, we will use appropriate safeguards and comply with the laws of the country to which your personal information is transferred. Details of the safeguards we use are available on request.

We keep your personal information for a set amount of time

Your personal information will be stored either for as long as you are our employee, or longer if required by law or as is otherwise necessary. It'll always be in line with our data retention policy.

Part D - Reference checks

We may use approved credit reference agencies, tracing companies, financial crime prevention agencies, previous employers or publicly available information, to help us to check your identity, help us offer you a position as well as to prevent fraud and money laundering; this may include checks on your current or previous addresses. Results of these may be recorded for future reference.

Should we ever lose contact with you, we may use these agencies to verify your address to help us get back in touch.

Any transfer of your personal information will always be done securely.

Part E – We may use your personal information to make automated decisions or profile you

We, Prudential Corporation Asia, the Prudential Group may use your personal information to make automated decisions affecting you or to conduct other profiling (for example, job suitability).

To the extent that we conduct such automated decision-making activity, we'll provide you with further information at the appropriate time.

Part F – Use of your sensitive personal information

We may need to process your sensitive personal information, such as information relating to health, genetics, biometric identifiers and sexual orientation. To the extent that we need your explicit consent to

process this kind of personal information in the manner described in Parts C, D, and E, we will provide details of this at the point of collection and seek your consent.

Part G – You’re in control

When it comes to how we use your personal information, you’ve got the right to:

- request a copy of your personal information for free (we may charge you for this if the request is manifestly unfounded or excessive);
- in certain circumstances request that we move your personal information to another organisation if you want us to;¹
- request that we correct anything that’s wrong, or complete any incomplete personal information;
- ask us to delete your personal information if it is no longer needed for the purposes set out in Part C or if there is no other legal basis for the processing;
- limit how we use your personal information or withdraw your consents (including automated decision making) you have given for the processing of your personal information if it is no longer needed for the purposes set out in C;
- object to us using your personal information for direct marketing (including related profiling) or other processing based on legitimate interests; and
- complain to a data protection authority or another independent regulator about how we’re using it.

Some of the above rights are specific to candidates, staff and ex-staff residing within EU jurisdictions. The rights applicable to you will depend on data subject rights provided under your local privacy law.

If you want to do any of these things, or would like an explanation about these rights, we’ve explained how you can get in touch in the Contact Us section.

If you do need to speak to us, it’ll be useful to have to hand that the data controller of your personal information is Prudential Corporation Asia. We may monitor or record calls or any other communication we have with you. This might be for training, for security, or to help us check for quality.

Part H – Acting on someone else’s behalf?

If you give us personal information about another person (or persons), we’ll take that to mean they have appointed and authorised you to act on their behalf. This includes providing consent to:

- our processing of their personal information and sensitive personal information (as we’ve explained in Parts A - G above); and
- you are getting any information protection notices on their behalf.

If for any reason you are concerned as to whether you are permitted to provide us with the other person’s information, please contact us at the email address below before sending us anything.

¹ We will provide any electronic information (not paper records) that we hold and only that which you provided to us – we will not provide the results of any processing carried out on that data.

Contact us

If you want to exercise your rights in Part G or if you require any other information about any other part of this notice, you can contact us by email at privacy@prudential.com.hk or by contacting your local HR team or local Data Privacy Manager.

Prudential Corporation Asia means Prudential Corporation Asia Limited.

The Prudential Group means Prudential Plc, Prudential Holdings Limited and any other affiliates of Prudential plc. Prudential Plc is not affiliated in any manner with Prudential Financial, Inc. a company whose principal place of business is in United States of America or with the Prudential Assurance Company, a subsidiary of M&G Plc, a company incorporated in United Kingdom.

Business Partners means our service providers, accountants, auditors, IT service and platform providers, intermediaries, reinsurers, investment managers, agents, pension trustees (and other stakeholders), scheme advisors, introducers, selected third party financial and insurance product providers, and our legal advisers.