

## HSBC CENTRESUITE PRIVACY NOTICE

This Privacy Notice (the “Notice”) supplements the [Online Privacy Statement - HSBC Bank USA](#) and applies solely to the information HSBC collects about users of HSBC CentreSuite in connection with vetting your eligibility to access certain HSBC commercial card products and services (collectively hereinafter referred to as the “Services”) and providing you the Services.

### About this Notice

HSBC = HSBC Bank USA, N.A., its banking and non-banking U.S. affiliates and subsidiaries and service providers (collectively, "HSBC ", "we", "our" and “us”).

You/Your = Customers and visitors (including their agents and representatives) of the entity or party you are acting on behalf of.

When you visit the Services, you acknowledge and agree to the terms of this Notice, except where a different online and/or mobile statement is posted indicating that it is intended to take the place of this Notice.

### Categories of Personal Information We Collect

For purposes of this Notice, “Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly with a particular consumer or household. Personal Information does not include deidentified, aggregated, or publicly available information that is lawfully made available to the general public from federal, state, or local government records. HSBC does not sell or share your Personal Information.

The categories of Personal Information we collect through HSBC CentreSuite include:

- **Identifiers:** such as name, address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address;
- **Transaction information:** such as logs of activities undertaken on HSBC CentreSuite; records of services requested and information provided;
- **Professional/employment information:** such as your job title, employer, work contact information, and your authority to act on behalf of your organization;
- **Sensitive Personal Information:** such as your account credentials.

### Our Purposes for Collection of Your Personal Information

We collect the categories of Personal Information described above to:

- Provide you or your organization with the Services available via HSBC CentreSuite;
- Respond to your inquiries and fulfill your requests;
- Inform you about important information regarding the HSBC CentreSuite and the Services;
- Allow you to apply for the Services, process transactions, and evaluate your eligibility for such Services;

- Perform activities such as data analysis, audits, and usage trends to improve our products and services and to enhance HSBC CentreSuite and the Services;
- Improve risk control for fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements;
- To carry out an agreement we have with you or the authorized persons you represent as part of our provision of HSBC CentreSuite and the Services.
- Confirm your identity and provide you with access to HSBC CentreSuite and the Services;
- Manage our relationship with you or the organization you represent (as part of our provision of the Services);
- Prevent or detect crime including fraud and financial crime, e.g. financing for terrorism and human trafficking;
- Protect our legal rights and comply with laws, regulations, and to fulfill our legal obligations.

## **How Long We Retain Your Information**

HSBC retains Personal Information collected in connection with HSBC CenterSuite and the Services for as long as we have a relationship with you or the business you represent, consistent with our record retention policies and as required by law. For example, we'll normally keep your core banking data for a period of seven years from the end of our relationship with you. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes such as managing your account and dealing with any disputes or concerns that may arise. We may need to retain your information for a longer period where we need the information to comply with regulatory or legal requirements, or where we have another lawful reason to do so, e.g. fighting fraud and financial crime, responding to requests from regulators, etc. If we don't need to retain information for this period of time, we may destroy, delete or anonymize it consistent with our records retention policies.

## **State Specific Data Privacy Rights**

If you are a California resident and whether or not you have an HSBC account, California law may provide you with additional rights. To learn more about your California privacy rights, [click here](#) for the California Consumer Privacy Act (CCPA) Statement.

## **Changes to this Notice**

If we make updates to our privacy practices, we will update this Notice with the changes and update the "last updated" date posted at the bottom of the Notice. Any updates to the Notice become effective when we post the updates on this site. Your use of HSBC Embedded Banking following any update to the Notice means that you accept the updated Notice.

Last Updated: March 15, 2023