

# Privacy Notice

1 October 2025

Bank of London and The Middle East plc ("**BLME**") is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. BLME appears on the FCA Register under firm reference number 464292. Bank of London and The Middle East plc is a company registered in England & Wales. Its company registered number is 05897786. The registered office address is 20 Churchill Place, Canary Wharf, London, E14 5HJ. Bank of London and The Middle East plc DIFC Branch is regulated by the Dubai Financial Services Authority ("DFSA"). The registered office is Office 2904, Level 29, Al Fattan Currency House, Dubai International Financial Centre, Dubai, UAE, PO Box 506557

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### 1. Introduction

This Privacy Notice (“**Notice**”) explains what personal information we collect and use about you, who we share it with and how you can exercise your data protection rights.

This Notice applies to the personal information we collect and process when we provide our products or services and will continue to apply following the end of our relationship with you. You should read this Notice in conjunction with any terms and conditions (“**agreements**”) that we provide to you in connection with our products or services.

Where you provide personal information about third-party individuals (e.g. dependants, joint account holders, or your representatives), you should also direct these individuals to this Notice to ensure they are aware of how we will use their information.

It is important that the personal information we hold about you is accurate and complete to the best of your knowledge, as we rely on this information to provide our products or services to you. You should therefore inform us of any changes to your information as soon as possible.

Some of the links on our websites, mobile applications and email communications may direct you to other third-party websites that are not under our control, such as partner networks, advertisers, social media networks or other group companies. These third parties have their own separate privacy notices explaining how they collect and process your information and you should read these notices to ensure you are content with how these third parties may use your information.

### 2. Who we are

Your personal information is collected by:

- Bank of London and The Middle East plc, a company registered in England and Wales under company registration number 05897786 and registered office address at 20 Churchill Place, Canary Wharf, London, E14 5HJ.

Bank of London and The Middle East plc is part of the Boubyan Bank Group and acts as the Controller of your personal information for the purposes of the applicable data protection laws. In this Notice we refer to ourselves as “**we**”, “**us**”, “**our**” or “**BLME**”.

### 3. How to contact us

If you have any questions about the contents of this Notice or would like to exercise your data protection rights, please contact our Data Protection Officer at:

Data Protection Officer  
BLME  
20 Churchill Place  
Canary Wharf  
London  
E14 5HJ

email: [dpo@blme.com](mailto:dpo@blme.com)

### 4. Complaints

If you have any concerns about the way we collect and process your information, please contact our Data Protection Officer in the first instance, using the contact details provided in section 3 (How to contact us).

You also have the right to complain to the relevant data protection regulator at any stage.

The UK Information Commissioner's Office can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF

Tele: 03031231113

Website: [ico.org.uk](https://ico.org.uk)

### 5. Collecting personal information

We collect personal information in accordance with applicable laws, where necessary to operate our business, provide our products or services and comply with our legal and regulatory obligations. This information may be collected from you directly and indirectly from other third-party sources.

You are required to provide any information we reasonably require to meet our obligations in connection with our products or services, including any legal and regulatory obligations. If you do not provide the information we require, we may be unable to provide the products or services you requested or we may terminate any products or services being provided with immediate effect.

### 5.1 Information we collect directly

The categories of personal information we collect about you may vary and is largely dependent on the products or services you have requested or receive from us. However, the categories of personal information we collect will generally include the information described below.

| Categories  | Description  |
|---|--|
| Personal details  | <ul style="list-style-type: none"><li>• Name</li><li>• Date of birth</li><li>• Place of birth</li><li>• Nationality</li><li>• Marital status</li><li>• Gender</li></ul>  |
| Contact details   | <ul style="list-style-type: none"><li>• Postal address</li><li>• email address</li><li>• Telephone number</li><li>• Social media account</li><li>• Where you interact with us in a business-to-business context, your business contact details</li></ul>                                 |
| Details of relationships with Boubyan Bank Group affiliates | <ul style="list-style-type: none"><li>• Whether you are an existing customer of an affiliate company in the Boubyan Bank Group</li></ul>   |
| Identity details  | <ul style="list-style-type: none"><li>• Photo identification</li><li>• National ID card</li><li>• Passport details</li><li>• National insurance number</li><li>• Your signature</li></ul>  |
| Employment and business details                             | <ul style="list-style-type: none"><li>• Where appropriate, your employment status, position at the organisation, salary, start date, details of any positions previously held and details of any sanctions disqualifying you from acting as a director or officer of a company</li></ul> |
| Authentication details                                      | <ul style="list-style-type: none"><li>• Authentication details for online and mobile banking applications</li><li>• Biometric data, e.g. liveness visual images or short video</li><li>• Your signature</li></ul>  |

|                   |   |
|-------------------|---|
| Financial details | <ul style="list-style-type: none"><li>• Bank account details</li><li>• Transaction details, e.g. deposits, balances, payment and payee information</li><li>• Financial circumstances, e.g. assets, liabilities, proof of income, expenditure details and credit and borrowing history</li></ul> |
| Correspondence    | <ul style="list-style-type: none"><li>• Records of any correspondence between us via various channels, such as telephone, email, online chat, instant messages and social media</li></ul>   |
| Market research   | <ul style="list-style-type: none"><li>• Feedback and opinions about our products or services</li></ul>  |
| Complaints        | <ul style="list-style-type: none"><li>• Complaints about our products or services</li></ul>   |
| Marketing         | <ul style="list-style-type: none"><li>• Direct marketing preferences</li></ul>  |

### 5.2 Information we collect indirectly

We may also collect personal information about you indirectly from other third parties. The categories of personal information we collect about you in these circumstances may vary and is largely dependent on the products or services you have requested or receive from us.

The categories of third parties that we source information from are described below.

#### Categories

#### Description

|  |   |
|--|---|
| Credit reference agencies                                  | We use credit reference agencies to assess your credit worthiness and help us determine whether it is appropriate to offer you our products or services   |
| Compliance, fraud prevention and risk management providers | <p>We collect additional information from third-party providers to check the accuracy of the information you have provided, prevent and detect crime, including financial fraud, manage internal risks associated with our business, and comply with our legal and regulatory obligations.</p> <p>The processes we use to collect this information may include:</p> <ul style="list-style-type: none"><li>• know your customer (KYC) checks</li><li>• credit reference agency checks</li><li>• financial status checks</li><li>• electoral register checks</li><li>• sanctions, politically exposed, adverse media and anti-money laundering checks, and</li><li>• financial crime, fraud prevention and fraud intelligence checks.</li></ul> |

## Nomo Privacy Notice

|  |   |
|--|---|
| Address verification service providers                                     | We collect information to verify your address and ensure the address we hold for you is accurate and complete   |
| Financial services providers   | <p>If you have asked us to, we may collect information about bank accounts you hold with other financial services providers, including any associated transactions and balances, and display information from these accounts on our platforms so they are accessible to you, e.g. where we act as an Account Information Service Provider under the Open Banking scheme.</p> <p>If you have asked us to, we may collect information to facilitate the transfer of your account to another provider in accordance with your instructions, e.g. where you switch banking providers.</p> <p>We collect information to investigate payments that have been incorrectly routed to the wrong account.</p> <p>Where necessary, we collect information to prevent and detect crime.</p> |
| Intermediaries, introducers, representatives or your professional advisors | We may collect information from intermediaries, introducers, representatives or advisors that you have appointed to act on your behalf  |
| Joint account holders  | If you hold a joint account with us, the joint account holder may provide information about you and your financial status   |
| Public sources, online registers or directories                            | We collect electoral register information, information available in the media and business contact details, such as email, telephone number, and business social media (e.g. LinkedIn) profiles   |
| Businesses you own or are associated with                                  | Where appropriate, we may collect information about the directors, partners, trustees, authorised officers or agents of your businesses or any business you have an interest in   |
| Boubyan Bank Group affiliates  | Where necessary, we collect information from our affiliates in the Boubyan Bank Group to help us manage and administer our products or services and prevent and detect crime  |

Where appropriate, information may be sourced from these third parties prior to us providing our products or services to you, to help us manage risks and comply with our legal and regulatory obligations. We may also periodically source information from these third parties during the course of providing our products or services to you.

### 5.3 Information we collect automatically

We collect personal information about you automatically, e.g. when you use our website or mobile applications or when we send you communications. This information will generally include the information described below.

| Categories                   | Description   |
|------------------------------|---|
| Online identifiers           | <ul style="list-style-type: none"><li>• IP address</li><li>• MAC address</li><li>• Device ID</li><li>• Device settings</li><li>• Operating system</li><li>• Geographic location</li></ul>   |
| Online analytics information | <ul style="list-style-type: none"><li>• Date and time of your visit to our website</li><li>• Internet browser type and version</li><li>• Internet browser settings</li><li>• Specific website pages you visit</li><li>• How you engage with our website content generally</li></ul>   |
| Social media                 | <p>Where you connect with us, contact us or otherwise engage with us using your social media account (e.g. Facebook, Twitter and LinkedIn) we will collect some information about your social media profile, such as your profile name and photo.</p> <p>You should read your social media provider's privacy notice and terms and conditions to understand how your information will be shared with us in these circumstances.</p> |
| Profiling                    | Demographic and profiling information may be derived from the personal information we collect about you   |
| Security information         | Information collected by our security monitoring systems and audit logs   |
| Cookies                      | <p>We use cookies to collect information about you when you use our website or mobile applications. When we collect this information, we either collect it with your consent or because it is strictly necessary to process the information to ensure our website and mobile applications operate effectively.</p> <p>For further information about how we use cookies, please see our separate <a href="#">Cookie Notice</a>.</p>  |



## 6. How we use your personal information

### 6.1 Lawful bases for processing

We are required to satisfy at least one of the lawful bases for processing personal information set out in the applicable data protection laws, before collecting and processing information about you. When we collect and process personal information, we rely on one or more of the lawful bases described below.

| Lawful bases        | Description   |
|---------------------|---|
| Consent             | When you give us your permission to carry out the processing  |
| Contract            | Where the processing is necessary to provide the products or services you have requested or fulfil our obligations in the agreements we enter into with you |
| Legal obligation    | Where the processing is necessary to comply with our legal and regulatory obligations   |
| Vital interests     | Where the processing is necessary to protect your vital interests or those of a third party   |
| Legitimate interest | Where the processing is necessary to pursue legitimate interests  |

### 6.2 How we use your personal information

This section describes how we use your personal information and which of the lawful bases (described above in section 6.1) we rely on to carry out the processing.

#### 6.2.1 Customer and prospect enquiries

We process your information when you contact us to enquire about our products or services.

We do this by reviewing your correspondence, communicating with you to address your enquiries, providing appropriate advice or guidance and taking any preparatory steps necessary to provide our products or services.

We carry out this processing to comply with our contractual obligations and to pursue our legitimate interest in responding to enquiries from customers and prospects that require or use our products or services.

### 6.2.2 Applications for products or services

We process your information when you apply to receive our products or services.

We do this by communicating with you to clarify the products or services you have requested, validating your identity, conducting due-diligence (e.g. anti-money laundering, terrorist financing, know your customer and fraud checks), assessing your financial status and credit history, conducting internal risk assessments, and taking any steps necessary to determine whether it is appropriate for us to provide the products or services.

We carry out this processing to comply with our contractual and legal obligations and to pursue our legitimate interest in protecting our business and preventing and detecting crime.

### 6.2.3 Customer onboarding and servicing

We process your information when we decide to onboard you as a customer.

We do this by entering into agreements with you for the provision of our products or services, providing the products or services requested (e.g. opening your account), addressing your complaints and managing and administering our relationship with you, including corresponding with you from time to time about the products or services you receive.

We carry out this processing to comply with our contractual obligations.

### 6.2.4 Customer identification and verification

We process your information to maintain the confidentiality and integrity of your information and our information systems.

We do this by verifying your identity before discussing your account details with you or allowing you to access the products or services you receive from us.

We carry out this processing to comply with our legal obligations and to pursue our legitimate interest in protecting our customer information and preventing and detecting crime.

### 6.2.5 Online banking

We process your information to provide you with online banking services through our website and mobile applications.

We do this by managing and administering our online banking services and maintaining the security of our online platforms.

We carry out this processing to comply with our contractual obligations and to pursue our legitimate interest in protecting our customer information and preventing and detecting crime.

### 6.2.6 Market research

We process your information to carry out market research.

We do this by contacting you from time to time to invite you to participate in market research and, where you participate, collecting and analysing your feedback to help us understand how our products or services are generally perceived by our customers.

We carry out this processing to pursue our legitimate interest in improving the products and services we offer.

### 6.2.7 Product and service improvement

We process your information to help improve our products or services.

We do this by analysing your interactions with our products or services, including our website and mobile applications, and making improvements to ensure we are meeting your expectations and the expectations of our customers generally. Where you give us your permission, we use cookies or similar technologies on our websites and mobile applications to carry out some of this processing.

We carry out this processing with your consent or where necessary to pursue our legitimate interest in improving the products and services we offer.

### 6.2.8 Call recording and monitoring

We process your information for training and quality purposes.

We do this by monitoring and recording our communications with you to ensure our products or services are being provided in accordance with our internal procedures and your instructions.

We carry out this processing to pursue our legitimate interest in monitoring and improving the products and services we offer.

### 6.2.9 Preventing and detecting crime

We process your information to prevent and detect crime. We do this by:

- conducting due-diligence, e.g. anti-money laundering, terrorist financing, know your customer and fraud checks
- monitoring your transactions and payment instructions, including who is making payments into your account and the recipient of any payments you make
- using CCTV in and around our office premises
- investigating incidents or suspicious transactions, and
- where we suspect fraud or other criminal activity, sharing information with relevant law enforcement agencies, fraud prevention agencies and other Boubyan Bank Group affiliates.

We carry out this processing to comply with our legal obligations and to pursue our legitimate interest in protecting our business and preventing and detecting crime.

### 6.2.10 Risk management

We process your information to conduct risk assessments at various stages, including prior to and during the course of us providing products or services to you.

We do this by conducting credit risk assessments to determine whether it is appropriate to provide our products or services to you and to manage our overall exposure to risks.

We carry out this processing to comply with our legal obligations and to pursue our legitimate interest in managing risks to protect our business.

### 6.2.11 Appropriateness assessments

Where appropriate, we may process your information to assess whether you have the necessary knowledge and experience to understand the risks associated with any investment products or services you have requested, to help us determine whether it is appropriate to provide the products or services.

We do this by analysing the information we have in our possession and any additional information we request from you, to determine whether you have the necessary knowledge and experience about the products or services. We may also provide you with information to increase your understanding of the relevant products or services.

We carry out this processing to comply with our legal obligations.

### 6.2.12 Direct marketing

We process your information to send you direct marketing about products or services that we feel may be of interest to you and create marketing lookalike audiences.

We do this by collecting information about you and your direct marketing preferences, analysing your interactions with our products or services, including our website and mobile applications, and combining this with other demographic information we know about you to personalise our marketing communications and make them more relevant to you. We use cookies or similar technologies to personalise the advertising displayed to you on our website and mobile applications.

We create lookalike audiences by sharing limited hashed de-identified information with social media companies like Facebook. This helps us to identify similar customers that are likely to engage with our brand.

You can change your mind about how you receive direct marketing or unsubscribe from direct marketing altogether by contacting us or clicking on the unsubscribe option included in every direct marketing communication we send you.

If you unsubscribe from direct marketing, we will take the necessary steps to ensure you no longer receive such communications and cease using your information for direct marketing purposes. However, we will continue to send you important service messages about any changes we make to the products or services you receive.

We carry out this processing with your consent or to pursue our legitimate interest in promoting our business and related products or services.

### 6.2.13 Rewards and incentives

We process your information to offer rewards and incentives and run competitions from time to time.

We do this by occasionally offering rewards and incentives and running competitions. Where you choose to participate, we will collect and process your information in connection with the offer.

We carry out this processing to comply with our contractual obligations in connection with our offers. If we send you direct marketing to promote an offer, any processing of your information specifically for direct marketing will be carried out in accordance with section 6.2.12 (Direct marketing).

### 6.2.14 Confirmation of payee

We process your information as part of the Confirmation of Payee (“**CoP**”) scheme.

We do this by sharing your name with third parties that make payments into your account, where necessary under the CoP scheme to confirm a payment is being made to the right account. If you would like to opt-out of CoP, please contact our Customer Services team.

We carry out this processing to pursue our legitimate interest.

### 6.2.15 Vital interests

We process your information for health and safety purposes, e.g. in emergency situations.

We do this by sharing information about you with other third parties (e.g. law enforcement agencies or medical emergency personnel) where necessary to protect your health and safety or that of another person.

We carry out this processing to protect vital interests.

### 6.2.16 Protecting our rights

We process your information to protect and defend our legal rights.

We do this by enforcing our rights under any agreements you have entered into with us, protecting our intellectual property, defending complaints, disputes or associated litigation and collecting any outstanding payments or debts.

If we are sold to, acquired by or merged with another organisation, in whole or in part we may transfer your information to the successor of our business.

We carry out this processing to and to pursue our legitimate interest in enforcing our legal rights to protect our business.

### 6.2.17 Legal and regulatory obligations

We process your information to comply with our legal and regulatory obligations.

We do this by complying with all applicable laws, including any regulatory obligations imposed on us as a regulated financial services firm. For example, we may disclose your information to law enforcement agencies and regulatory bodies where necessary to comply with our legal and regulatory obligations.

We carry out this processing to comply with our legal obligations.

## 7. Sensitive personal information

### 7.1 Categories of sensitive information

Some of the information we collect and process about you includes sensitive personal information, also commonly referred to as special categories of personal information. We only collect sensitive personal information if we have your explicit consent or if we are lawfully permitted to collect the information without your consent.

The categories of sensitive personal information that we collect about you are described below.

| Categories              | Description   |
|-------------------------|---|
| Racial or ethnic origin | Details about your race or ethnicity  |
| Political opinions      | Details about your political opinions or affiliations                                     |
| Biometric data          | Details about the unique physical characteristics that are used to validate your identity |
| Health information      | Details about your health status and disabilities   |
| Criminal convictions    | Details about your criminal convictions or alleged offences                               |

### 7.2 How we use sensitive personal information

This section describes how we use your sensitive personal information and why we carry out the processing.

#### 7.2.1 Applications for products or services

We process your sensitive information when you apply to receive our products or services. The information we process may include details about your racial and ethnic origin, political opinions, criminal convictions and biometric data.

We do this by validating your identity, conducting due-diligence (e.g. anti-money laundering, terrorist financing, know your customer and fraud checks).

We carry out this processing in the public interest and to prevent and detect unlawful acts.

### 7.2.2 Customer identification and verification

We process your sensitive information to maintain the confidentiality and integrity of your information and our information systems. The information we process may include your biometric data.

We do this by verifying your identity before discussing your account details with you or allowing you to access the products or services you receive from us.

We carry out this processing in the public interest and to prevent and detect unlawful acts.

### 7.2.3 Preventing and detecting crime

We process your sensitive information to prevent and detect crime. The information we process may include details about your racial and ethnic origin, political opinions, criminal convictions and biometric data.

We carry out this processing in the public interest and to prevent and detect unlawful acts.

### 7.2.4 Protecting our rights

We process your information in connection with legal claims. The information we process may include details about your racial and ethnic origin, political opinions, criminal convictions, health and biometric data.

We do this by enforcing our rights under any agreements you have entered into with us, protecting our intellectual property, defending complaints, disputes or associated litigation and collecting any outstanding payments or debts.

We carry out this processing to establish, exercise or defend legal claims.

### 7.2.5 Reasonable adjustments

If you inform us that you have a disability, we may process your information to make reasonable adjustments to enable you to access our premises or our products or services.

We do this to allow you to access our premises, products or services, e.g. if you ask to provide you with statements in braille.

We carry out this processing to comply with our legal obligations.

## **8. Who we share your personal information with**

### **8.1 Data sharing purposes**

Where necessary, we share some of your information with third parties in order to:

- comply with your instructions, e.g. where a third party has requested the information and you have given your permission for the information to be disclosed
- provide you with the products or services you have requested, e.g. some aspects of our products or services may be provided under instruction by our affiliates in the Boubyan Bank Group or other external partners
- carry out due diligence and risk management checks to assess your suitability to receive the products or services
- comply with our legal and regulatory obligations, e.g. to prevent and detect crime or for regulatory reporting purposes
- exercise or protect our rights, or
- where we have another legitimate business reason.

### **8.2 Categories of recipients**

We share information with the following categories of recipients:

- Boubyan Bank Group affiliates, where, (1) they provide services to us in connection with the products or services we provide to you, (2) it is necessary for the prevention or detection of crime, (3) you previously held an account with one of our affiliates before opening an account with us, in which case we may request some information from the affiliate company to assist with the opening and ongoing maintenance of your account with us, or (4) where they assist us with market research
- Banks, where necessary to prevent and detect crime or investigate payments that have been incorrectly routed to the wrong account
- Card issuers if you have a credit or debit card with us
- Courts of law and the judiciary in any jurisdiction, where the law requires us to
- Credit reference agencies
- Debt collection agencies, where necessary for debt recovery
- Dispute resolution bodies
- Financial services providers, where you have asked us to, e.g. where you sign up to use the services of a third-party provider that is registered as an Account Information Service Provider or Payment Initiation Services Provider
- Fraud prevention agencies
- Guarantors, in the event you default on a loan



- Intermediaries, introducers, brokers, representatives, your professional advisors or anyone else you have appointed to act on your behalf
- Joint account holders
- Law enforcement and government agencies, where necessary to prevent and detect crime
- Payment services providers, to help us process your payments
- Professional advisors that help us operate our business, e.g. lawyers, accountants, auditors, compliance advisors, and risk management providers, and other vetting agencies
- Public authorities, e.g. Her Majesty's Revenue & Customs, UK Financial Services Compensation Scheme
- Regulatory bodies, including any auditors they appoint to carry out assessments or investigations
- Social media companies, where you connect with us, contact us or otherwise engage with us using your social media account
- Successors of our business, if we are sold to, acquired by or merged with another organisation, in whole or in part
- Trustees, beneficiaries or executors
- Third parties that make payments into your account, where necessary under the CoP scheme to confirm a payment is being made to the right account. If you would like to opt-out of CoP, please contact our Customer Services team
- Third-party service providers that process personal information on our behalf, in accordance with our strict instructions and our security standards
- Other third parties, where we are legally required to do so under applicable laws.

### 8.3 Selling and licensing information

We do not sell, rent or trade your information. Nor do we allow other third-party organisations to use your information for direct marketing without your consent.

## 9. How we protect your information

We have implemented appropriate technical and organisational security measures to keep your information secure, including pseudonymisation, encryption and other security measures. These security measures are designed prevent unauthorised access, loss, misuse or alteration of your information.

When you apply to receive our products or services you may be asked to select a password. Your password is used to ensure your information remains secure and can only be accessed by you. We strongly recommend you select a strong password that is easy for you to remember, but hard for others to guess. We also recommend you do not select a password to access our products or services that you have previously used on other third-party websites.

Your password must be kept confidential – never share it with anyone.

## 10. How long we keep your information

We keep your information for the period that we provide our products or services to you and for a predefined period following the end of our relationship. We also retain your information to comply with our legal and regulatory obligations, such as anti-money laundering regulations.

We generally retain your information for six years following the end of our relationship with you. However, we may retain your information for a longer period if this is necessary to comply with our legal and regulatory obligations, prevent and detect crime or manage and administer any ongoing complaints or disputes, including any associated litigation.

## 11. Cookies and similar technologies

We use cookies and similar technologies on our websites and mobile applications. Cookies are small text files that are automatically downloaded and stored on your device when you visit our website or use our mobile application. Cookies gather and store information and are used to perform a variety of different functions, such as analysing your interactions with our website and remembering your website preferences. We also use cookies to personalise the advertising displayed to you on our website and mobile applications.

For further information about how we use cookies, please see our separate [Cookie Notice](#).

## 12. Credit reference agencies and fraud prevention agencies

### 12.1 Credit reference agencies

When you apply to receive our products or services, we may use credit reference agencies to carry out identity and credit history checks. We may also conduct such checks periodically, during the course of us providing products or services to you.

We exchange information about you with credit reference agencies to:

- verify your identity and check the accuracy of the information you have provided to us
- determine whether we can offer the products or services you have requested
- conduct affordability checks to ensure that any offers that we send you are appropriate
- assess and report on your account status and repayment history
- prevent and detect crime
- trace and recover any outstanding debts.

We do this by sharing some personal information about you with credit reference agencies to enable them to identify your records. The credit reference agencies then share some information with us about you, including information about your credit history.

If you receive credit or finance from us and do not make repayments on time, we may share this information with credit reference agencies. The credit reference agencies may, in turn, share this information with other organisations and these organisations may use this information to determine whether to offer you credit in the future.

Where you make a joint application to receive our products or service or otherwise inform us that you are financially linked to another person, such as your spouse, partner or business partner, the information we hold about you will reflect that you are financially associated with that person, and this information may be shared with credit reference agencies. You should therefore ensure that you discuss your application with the person you are financially associated with before submitting your application to receive any products or services from us.

When a financial association is recorded with credit reference agencies, this will be taken into account in all future credit applications that you and your partner make individually or jointly, until such time that either you or your partner file for a disassociation with the credit reference agencies to remove the association.

To find out more about credit reference agencies and how they process your information, please refer to the Credit Reference Agency Information Notice (“**CRAIN**”), which explains how credit reference agencies in the UK use your information. The CRAIN is available on the credit reference agencies’ websites at:

- [www.transunion.co.uk/crain](http://www.transunion.co.uk/crain)
- [www.equifax.co.uk/privacy-hub/crain](http://www.equifax.co.uk/privacy-hub/crain)
- [www.experian.co.uk/crain](http://www.experian.co.uk/crain)

## 12.2 Fraud prevention agencies

When you apply to receive our products or services, we use fraud prevention agencies to carry out fraud and anti-money laundering checks to verify your identity.

We do this by sharing some of your personal information with fraud prevention agencies, such as your name, address, date of birth, contact details financial details, employment details, device identifiers and other online identifiers, such as your IP address. This information may have been collected from you directly or indirectly from other third parties.

We and fraud prevention agencies may also allow law enforcement agencies to access and use your information to detect, investigate and prevent crime.

Fraud prevention agencies can hold your personal information for different periods of time. Where you are considered to pose a fraud or money laundering risk, your information can be retained for up to six years.

To find out more about fraud prevention agencies and how they process your information, please refer to the CIFAS privacy notice ([www.cifas.org.uk/fpn](http://www.cifas.org.uk/fpn)), which explains how fraud prevention agencies use your information.

### **12.3 Consequences of processing**

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the products or services you have requested or terminate any products or services being provided with immediate effect.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies and may result in other third parties refusing to provide products, services, financing or employment to you in the future.

## **13. International transfers**

We are established in the UK and DIFC. However, some of the third-party service providers we rely on to provide our products or services are established in other countries and territories outside the UK and DIFC.

We may therefore transfer your personal information to other countries and territories outside the UK and DIFC where necessary to operate our business, including to some countries and territories that may not be considered to provide an equivalent level of protection for information.

However, where we make such transfers we will put in place appropriate safeguards, such as approved standard contractual clauses and, where necessary, other technical and organisational measures, to ensure the information is afforded an adequate level of protection.

If you require further information about the international transfers we make involving your information and the safeguards we have in place, please contact our Data Protection Officer, using the contact details provided in section 3 (How to contact us).

Fraud prevention agencies may also transfer your information to other countries and territories outside the UK. Where they make such transfers they will put in place appropriate safeguards, such as approved standard contractual clauses and, where necessary, other technical and organisational measures, to ensure the information is afforded an adequate level of protection.

## 14. Your information rights

### 14.1 Information rights

You have a number of rights in relation to the personal information that we hold about you. The availability of these rights and the ways you can use them are explained in more detail below.

| Information rights | Description |
|--------------------|-------------|
|--------------------|-------------|

|                      |   |
|----------------------|---|
| Access               | You can ask us if we are processing information about you and, where that is the case, request a copy of the information  |
| Rectification        | You can ask us to rectify any inaccurate or incomplete information we are holding about you   |
| Erasure              | You can ask us to erase information we are holding about you. However, this is not an absolute right, and we may refuse a request for erasure if we need to keep your information   |
| Restriction          | You can ask us to restrict the processing of information about you in certain circumstances. However, this is not an absolute right, and we may refuse a request for restriction where appropriate  |
| Portability          | You can ask us to transfer some of the information we are holding about you to a third party, in a structured machine-readable format   |
| Object               | You can object to the processing of information about you in certain circumstances. However, this is not an absolute right, and we may refuse to cease processing the information, where there are compelling legitimate grounds to continue the processing |
| Automated processing | You can ask not to be subject to a decision that is taken about you automatically using our technology, without human involvement, which significantly affects you. See the information provided below in section 14.2 (Automated processing)               |
| Direct marketing     | You can change your mind about how you receive direct marketing or unsubscribe from direct marketing altogether by contacting us or clicking on the unsubscribe option included in every direct marketing communication we send you                         |
| Consent withdrawal   | If we rely on your consent to process information about you, you can withdraw your consent at any time. However, we may still be entitled to process your information if we have another legitimate reason for doing so                                     |

### 14.2 Automated processing

When we refer to automated processing, we mean automated decisions which significantly affect you, which are taken automatically without any human involvement using our technology. Automated processing may also involve profiling so we can better understand your circumstances and behaviours and take appropriate steps manage risks.

We carry out automated processing from time to time for the purposes described below.

|                                    |   |
|------------------------------------|---|
| Regulatory processing              | <p>We assess whether you pose a fraud or money laundering risk, when you make an application to receive our products or services.</p> <p>We assess your credit worthiness to help us make decisions about whether we can offer you credit or lending products.</p> <p>We conduct periodic risk assessments and transaction monitoring, e.g. to determine whether you are able to keep up with payments and whether you pose a fraud or money laundering risk.</p> |
| Preventing and detecting crime     | <p>We monitor your payments and transactions to prevent and detect crime. For example, we may monitor your transactions to protect your account from financial crime, e.g. to identify suspicious or unusual transactions which indicate your account has been compromised and is being used by someone without your permission</p>   |
| Identifying dormant accounts       | <p>We assess whether accounts are being actively used or are dormant. For example, where an account has not been used for an inordinate period, we may take steps to close the account</p>  |
| Assessing investor appropriateness | <p>Where appropriate, we assess whether you have the necessary knowledge and experience to understand the risks associated with any investment products or services requested</p>   |

Where we conduct automated processing, you have the right to request information about the logic we use to make such decisions, subject to any applicable exemptions. You also have the right to ask for an automated decision to be made by a person instead of a computer.

### 14.3 Exercising your information rights

If you would like to exercise your data protection rights, please contact our Data Protection Officer, using the contact details provided in section 3 (How to contact us).

It is important to note, however, that some of the aforementioned rights are not absolute and can only be exercised in certain circumstances. If we are unable to fulfil an information rights request, will write to you explain the reason for refusal.

## **15. Changes to this Notice**

This Notice is not contractual and will be updated from time to time to ensure it continues to accurately reflect the way we collect and process personal information. Any updates or changes to this notice will be published on our website [here](#). You should therefore periodically review this Notice to understand how we collect and use your information.

We will also notify you in advance of any material changes that we make to the Notice, so you understand what impact any changes may have on you and how you can exercise your rights.