

Ahli United Bank (UK) PLC - Privacy notice for customers

WHAT IS THE PURPOSE OF THIS DOCUMENT?

This privacy notice relates to Ahli United Bank (UK) PLC, which is a company registered in England & Wales with Company Number 00877859, and registered with the UK Information Commissioner's Office with registration number Z6416792, together with its subsidiaries (collectively "AUBUK"). Where in this privacy notice we refer to "our", "us" or "we", we are referring to the relevant entity of AUBUK that is carrying out the processing of personal information.

AUBUK is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

This privacy notice is prepared for customers of AUBUK and any reference to personal information is a reference to the personal information of a customer who is a living individual.

AUBUK is a "data controller" of personal information. This means that we are responsible for deciding how we hold and use personal information about you. We are required to notify you of the information contained in this privacy notice. In order to keep this information correct, we will update this notice from time to time and we will publish on our website the current privacy notice.

It is important that you read this privacy notice so that you are aware of how and why we are using personal information.

THE PERSONAL INFORMATION WE WILL HOLD ABOUT YOU

Personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect and hold the following personal information about you:

- Personal information you provide to us.

This covers personal information that you provide to us when enquiring, requesting or receiving services or products from AUBUK. This includes personal information you provide as part of corresponding with us (whether by email, telephone or otherwise) as well as any personal information you provide when completing forms and contracts we require you to complete to receive services or products from us.

The personal information you provide could include your contact details (such as your name and address), personal details (such as date of birth and nationality) and financial information (such as details of your salary, savings or other assets).

- Personal information we collect from sources other than you.

This covers personal information that is provided to us, usually electronically, by a third party. This is personal information we obtain from third parties to allow us to offer or provide services and products to you such as fraud monitoring or credit checking.

When you apply for a service or product from AUBUK, the relevant application form or agreement will set out any further details that are necessary to confirm the personal information we may collect and hold about you.

HOW WE WILL USE YOUR PERSONAL INFORMATION

In accordance with the GDPR we must ensure that we only use your personal information as described in this privacy notice where we meet certain conditions. The conditions we are relying upon to use your personal information are set out below and more than one condition can apply to a situation, depending upon the circumstances.

- 1. Providing our products and services under contract;** we use your personal information to the extent necessary for us to provide the products and services to you on the terms agreed between us. This also covers anything you ask us to do prior to providing a product or service, such as processing an application, payment transaction or providing a quote.
- 2. Meeting a legal obligation;** we use your personal information where necessary to comply with any legal obligation imposed upon us. For example, processing your personal information for “know your customer” checks or for tax reporting.
- 3. Legitimate interests;** for any other reasons described in this privacy notice, we use your personal information on the basis of legitimate interests. This means that, on balance, we consider that it is necessary to use your data in the described way for a legitimate reason. We are required to balance your interests, rights and freedoms as an individual against the legitimate interest we are trying to pursue. If we can achieve the same result without processing your personal information, we will adopt that approach. It is our intention to give full and proper consideration to your interests when relying upon this condition to process your personal information.
- 4. Consent;** in limited circumstances, we may use your personal information where you have provided your consent for us to do so. Where you are asked to provide consent, we will provide further details of the reason and use of your personal information when requesting such consent.

Situations in which we will use your personal information

We use the personal information you provide to us for the following purposes:

- As necessary to provide you with any information, quotes or other request you make of us, including processing any applications for our products and services.
- As necessary to comply with the terms of any agreement we have entered into with you for the provision of our products or services (including our General Terms and Conditions Governing Accounts and Services).
- To notify you of any changes to our products and/or services
- To comply with any legal obligations imposed upon us, such as “know your customer” checks or for tax reporting.
- To audit or monitor our processes, systems and controls regarding our business, products or services to ensure that we are operating appropriately and in accordance with all laws, rules and regulations.
- For analytical purposes to help us improve our business;
- To provide you with marketing information about other services or products we offer that are similar to those that you have already enquired about, or services or products you have consented to receiving.

When you receive a service or product from AUBUK, the relevant application form or agreement will set out any further details that are necessary to confirm the personal information we may collect and hold about you.

If you fail to provide personal information

If you fail to provide certain personal information when requested, we may not be able to perform the agreement we have entered into with you (such as offering you an account), or we may be prevented from complying with our legal obligations (such as “know your customer” checks). This may prevent us from being able to offer, or continue to offer, you the service or product.

SHARING YOUR PERSONAL INFORMATION

We may share your data with third parties, including third-party service providers and other entities in the AUBUK Group.

We require third parties to respect the security of your data and to treat it in accordance with applicable data protection law.

We will transfer your personal information outside the EU. When we do, you can expect a similar degree of protection in respect of your personal information, as afforded in the EU.

The AUBUK Group

We share your personal information with our parent company, based in Bahrain. We do this to benefit from centralised IT systems, provided by our parent company that allow us access to larger, more sophisticated systems to process your personal information. In order to ensure your personal information is adequately protected in accordance with the GDPR, we have put in place with our parent company a set of standard contractual clauses published by the European Commission.

If you require further information about our sharing of your personal information, you can request it from the Data Protection Officer.

Other Third Parties

We share your personal information with other Third Parties in the following situations:

Card Payments:

Where you have a Visa card with us, we share your personal information with Visa Europe Limited to allow payment transactions or ATM withdrawals to take place. In addition, your personal information will be processed by the person you are paying (on a payment transaction) or the ATM provider (on a withdrawal). Our agreement with Visa Europe Limited places obligations upon us both to process data in accordance with applicable data protection law.

Where you make a payment transaction or ATM withdrawal outside of the EEA, we will need to transfer personal information as necessary to facilitate that payment.

DATA RETENTION

We shall retain your personal information in accordance with our internal retention policies from time to time. We base our minimum retention periods upon industry guidance and the requirements of laws and regulations. We will only retain your personal information for a longer period than our retention policies where there is a legitimate reason, taking into account your rights under the GDPR.

YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION

The GDPR gives you certain rights in relation to your personal information. In certain circumstances, you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party, in a commonly used format.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legal basis for doing so.

QUESTIONS AND COMPLAINTS

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO.

The details of our DPO are set out below:

Data Protection Officer
Ahli United Bank (UK) PLC
35 Portman Square
London W1H 6LR
E-Mail: AUBUK.DataProtection@AhliUnited.com

If you have any concerns about our processing or use of your personal information, please do contact the DPO. In the event that you are not satisfied with our handling of any request or complaint, you also have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. Their address is:

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