

# Data Privacy Notice

This Notice provides an explanation of the information we collect about you.

Please read the bank's Privacy Notice below carefully to understand our practices on how we will treat your personal data.

If you have a question about something in this Notice, or want to contact our Data Protection Officer at 81, Gracechurch Street, London EC3V 0AU or send us an email at [dpo@fcmbuk.com](mailto:dpo@fcmbuk.com).

## Who we are

For the purpose of General Data Protection Regulations (GDPR); the controller of your personal data 'data' is FCMB Bank (UK) Limited 81 Gracechurch Street, London, EC3V 0AU. We are authorised by the Prudential Regulation Authority and are regulated by both the Financial Conduct Authority and the Prudential Regulation Authority. (Financial Services Register number: 502704).

We are registered with the UK data protection authority (the Information Commissioner's Office or (ICO) under number Z1726573.

## What do we mean by personal data?

Any information that is about you, or that can be used to identify you, is personal data, which includes your name, email, phone number, information on your passport or driving licence number, and online or device information like IP addresses.

## Scope of this Privacy Notice

This Privacy Notice applies to you if you fall into any of the categories of people listed:

- Visitors to our website or social media pages or people who interact with our digital advertisements.
- Anyone who applies for an account with FCMB UK.
- FCMB UK account holders, and people who have previously held an FCMB UK account.
- Someone who makes or receives a payment to or from an FCMB UK account.
- Representatives of an FCMB UK account holder (such as those holding a valid power of attorney, appointed third parties or executors).
- Anyone who corresponds with us by post, email, social media or any other method of communication that we employ.

### 1) [How we collect your personal data](#)

How we collect and process data about you is described below.

#### **We collect personal data about you when:**

- You apply for, open or use any FCMB UK account
- You visit our website or use our products or services.
- We search public sources, such as news reports that may link you to fraud, money laundering or crime. We also search public sources to identify politically exposed people using our services.
- We also search lists of government sanctions and run searches.

- We request personal data from third parties, whom we use to check your identity and risk profile.
- We receive personal data from regulators or law enforcement agencies about you.
- This could happen when you visit the website, apply for an account, hold an account or you make a payment to an account.
- You make a complaint.

## 2) What personal data we collect

The table below provides details about the data we collect about you.

<b>Data we collect, generate and use</b>	<b>When we collect it</b>
<p><b>Contact information</b> This includes names, addresses (including address history), email addresses and phone numbers.</p>	<p>When you apply for an account or communicate with us through our Relationship Managers, or website or Internet banking.</p>
<p><b>Data used to verify your identity</b> This includes information such as your full name, date of birth, address, login credentials, tax information, IP address, passport or driving licence details, or details from any other identity documents you provide us with.</p>	<p>When you apply for an account or when you have an account with us.</p>
<p><b>Your source of funds</b></p>	<p>When you apply for or have an account with us.</p>
<p><b>Account activity information</b> This includes information about your relationship with us, including the products and services you use, your transactions and your ways of interacting with us.</p>	<p>When there is any activity on your FCMB UK account.</p>
<p><b>Complaints information</b> This includes details about your complaint, and the progress and outcome of your complaint.</p>	<p>Whenever you make a complaint.</p>
<p><b>Identification and anti-fraud data</b> This includes any information about you that is linked to your name, addresses, phone number, email address, devices or bank accounts that help us build up a profile of you.</p>	<p>When you apply for an account or when you're an account holder.</p>

<p><b>Information about products or services you have shown an interest in</b></p>	<p>When you visit our website, apply for an account or hold or manage an account with us.</p>
<p><b>Tracking technology information</b> This includes information from cookies and similar tracking technologies we use.</p>	<p>When you visit our website or login to your account.</p>
<p><b>Communications information</b> This includes details of the channels (for example, post and email) you have opted into to receive direct marketing and other communications from us.</p>	<p>When you apply for an account or when you are an account holder.</p>
<p><b>Due diligence and compliance data</b> This includes information from investigations we conduct such as due diligence checks, sanctions and anti-money laundering checks.</p>	<p>When you apply for an account and for as long as you hold an account with us.</p>

### Sensitive data

Some sensitive types of personal data have special status under data protection law. Details of the main types of sensitive data we process and when we collect them are set out in the table below.

<b>Data we collect, generate and use</b>	<b>When we collect it</b>
<p><b>Health information</b> This includes details about particular health or disability requirements that you want us to be aware of, so we can help you make use of our services. If this applies to you, we will provide you with more information at the relevant time.</p>	<p>When you share this information with us on the phone or by email or through our website or social media pages.</p>
<p><b>Criminal offences information</b> This includes criminal offences or criminal records that we become aware of.</p>	<p>When you apply for an account, make a payment.</p>

### 3) Why we use your personal data

We will only use your personal data where we have a lawful reason to do so which includes:

#### **To meet our legal obligations**

We use your personal data to help us comply with the relevant laws and regulations that apply to us and our products and services, including laws and regulations which relate to:

- The provision of banking services;
- Anti-money laundering, terrorist financing and the prevention and detection of unlawful acts and criminal activity;
- Consumer protection;
- Third party access (for example, in relation to powers of attorney); and
- Taxation.

#### **To fulfil our contract with you**

When you become a FCMB UK customer we agree to provide you with certain services. We will use your personal data where it is necessary for us to meet the obligations in our contract with you, such as to apply interest payments, facilitate payments to and from your account and produce annual Notices.

Under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 in the UK, we are required to respond to data protection requests within one month from the date of receipt.

However, we can extend this timeline by an additional two months where we deem the request to be complex or if the Bank receives a high number of requests.

If an extension is necessary, we will notify you within one month, and provide you with the reasons for the delay.

The overall timeline, could extend up to three months from the request.

#### **When using your data is necessary for our legitimate interests**

This might happen where it is in our legitimate business interests to analyse how you interact with our services so that we can continue to develop and improve our website and products.

#### **It is necessary for our legitimate interests to use your personal data to do the following:**

- Conduct all necessary checks that help us to comply with the law and manage our risks appropriately.
- Contact you when we need to provide you with information about our services.
- Fulfil our regulatory obligations and business requirements by keeping records of calls, correspondence and our business activities and archiving and backing up data.
- Analyse market trends and user preferences to test and evaluate our existing products and research potential new services.

- Help train our staff so that we can maintain the quality of our products and services.
- Maintain the security of your account and our services.
- Produce management information and reports to help us identify potential issues, for example, monitoring and managing financial, reputational, conducting audits of our business, liaising with our regulators, protecting data used by our business and establishing, enforcing, and defending against legal claims.
- Understand, maintain and improve the performance of our business.
- Protect you against fraud, money laundering and crime.

#### 4) Who do we share your personal data with and why

We share your personal data with our staff of FCMB UK and with third party service providers, who act on our instructions and on our behalf to help provide you with our products and services.

Why we share your data	Who we share your data with
To provide services to you, such as processing payments you make and fulfil our contractual obligations to you.	Banks, anyone who acts as a payee on an account and third-party service providers.
We may process your information and store it on servers managed by our hosting providers to provide the services.	When you open your account.
To help detect, investigate and prevent fraud, money laundering or crime.	Law enforcement agencies, fraud prevention agencies and third-party service providers who may share it with others for the same reason.
When we are required to do so by law, or when we're asked to respond to requests from law enforcement agencies or regulators.	Law enforcement agencies, government, regulators, courts, dispute resolution bodies and tribunals.
To verify your identity.	Credit reference agencies and third- party services providers.
If our business, or part of it, is sold or reorganised, including any transfer or potential transfer of any of our rights or duties under our agreement with you.	Prospective or actual purchasers or transferees and their advisors.
We may need to share your data with tax authorities to comply with both UK and international obligations.	HMRC, which may share your data with tax authorities in other countries.
Other extenuating circumstances, such as litigation or asserting or defending our legal rights and interests or if we need to get legal advice.	Any other person or company we reasonably think we need to. For example, with our lawyers.
To send direct marketing messages to you.	Any third parties who provide marketing services to you on our behalf.
For market research purposes and to identify customer trends.	Market research agencies acting on our behalf.

#### 5) How long will we keep your data

We have a regulatory obligation to retain your data for a minimum of 6 years after which time it will be destroyed. We may hold onto your data for an indefinite period where there may be legal ramifications if the data is deleted.

#### 6) Transfers outside the UK and the EEA

We may transfer your personal data outside the UK and the European Economic Area (EEA) to provide our products and services.

We may transfer information to servers located across a number of secure data centres in the UK and EEA. Our server environment is highly secure and there is very limited personnel access. Any information will be encrypted "at rest" (in other words, on being stored).

Your information may be transferred to, and stored at, a destination outside the UK and EEA as well as processed by staff operating outside the UK and EEA who work for them. We will ensure that suitable safeguards are in place before your information is transferred outside the UK and EEA as required by law and we will take all steps reasonably necessary to ensure that information about you is treated securely and in accordance with this Notice. Where recipients of your personal data are located in countries that are outside the UK and EEA and do not provide for the same level of data protection as considered adequate in the UK and European Union, we take appropriate measures to ensure that your data is protected. For example, where required, our service providers and affiliates sign standard contractual clauses approved by the European Commission, or other supervisory authorities.

If you are outside the UK and EEA and make payments or send messages, or you are in the UK and EEA and make payments or send messages outside the UK and EEA, we may process payments through other institutions and payment systems. They may have to process and store information about you in connection with their own regulations. Please note that the standards to which they adhere may not be as stringent as those in the UK and EEA.

The transmission of your information through the Internet is not 100% secure. Although we will do our best to protect your information, we cannot guarantee the security of information about you transmitted to us and so any transmission is at your own risk. Once we have received your information, we will use strict procedures and security measures to try to prevent unauthorised access.

#### 7) How we keep your data secure

FCMB UK takes the security of your personal data seriously and provides training and education about privacy and data security to all our staff. We seek to limit access to your personal data to authorised employees, agents, contractors or vendors. We have also implemented physical, electronic and procedural measures designed to protect your data from loss and destruction as well as unauthorised access, disclosure and alteration.

## 8) Your rights

### **Access**

You have the right to be provided with information about the personal data we have about you and details of how we use it, as well as the right to receive a copy of such personal data. Your right of access can be exercised by emailing FCMB UK at [dpo@fcmbuk.com](mailto:dpo@fcmbuk.com).

### **Rectification**

You have the right to request that we rectify your information if it is incomplete or inaccurate.

### **Erasure**

You have the right to request that we erase your personal data in certain circumstances. We may continue to store your personal data if we are entitled or required to retain it.

### **Restriction of processing**

You can request that we restrict use of your personal data in certain circumstances. There may be situations where we are entitled to continue using your information and/or to refuse your request.

### **Data Portability**

You can ask to have transferred elsewhere information about you that you have provided to us.

### **Object**

You can ask us to stop using all or some of your information or to limit our use of it.

### **Withdrawal of consent**

Where we rely upon your consent to use your personal data, you have the right to withdraw consent at any time. This does not affect the lawfulness of the processing of your data carried out with your consent before the withdrawal. It is up to you whether to provide us with your personal data but in some circumstances, we will not be able to open or maintain your account if you fail to provide certain information.

### **Complaints**

If you have a complaint about how we use your personal information, please send an email to [dpo@fcmbuk.com](mailto:dpo@fcmbuk.com) in order to reach our Data Protection Officer.

If you are still not happy, you can refer your complaint with a data protection supervisory authority in the EU country you live or work, or where you think a breach has happened. The UK's supervisory authority is the Information Commissioner's Office (ICO). For more details, you can visit their website at [ico.org.uk](http://ico.org.uk).

### Updates to this Notice

We will update this Privacy Notice to reflect these changes wherever necessary and we will give you notice of any significant changes.

### Contact us

For issues, inquiries, queries or concerns regarding your data or this Privacy Notice, you can contact us by emailing [dpo@fcmbuk.com](mailto:dpo@fcmbuk.com) or write to:

#### The Data Protection Officer

FCMB Bank (UK) Limited  
81 Gracechurch Street, London  
EC3V 0AU

Or call 0207 220 1000

### Privacy Notice Consent

I have read and understood this Privacy Notice and I hereby consent to the use of my personal data in accordance with this Privacy Notice.

### Marketing Consent

I consent to receiving marketing emails about FCMB UK products and services.