

Data Protection Privacy Notice

Alpha Bank London Limited ('ABL', 'we') are committed to protecting your personal information and ensuring we respect your privacy.

This Privacy Notice explains how we will look after and use any personal information that we collect about you and tells you about your privacy rights and how the law protects you.

1 What Is Personal Information?

For the purposes of our terms of business and this Privacy Notice, "personal data" and "personal information" mean any information about you from which you can be identified. Examples of personal information include your name, home address, national insurance number, date of birth, telephone number and e-mail address but it also includes other pieces of information which can be used to identify you, either directly or indirectly. It does not include data where the identity has been removed (anonymous data).

2 Who We Are

Alpha Bank London Limited was established in 1922 and is a UK regulated bank.

Alpha Bank London Limited is the Controller of the personal information you provide to us. This is because we determine the purpose for which and means by which your personal data is collected and used. If you have any questions about this Privacy Notice or the information we hold about you, including any requests to exercise your legal rights as set out in section 13 below, please contact our Data Protection Officer, using the details set out below.

3 How to Contact Us

You can contact us:

by phone on: +44(0)20 7332 6767
by email: DPO@alpha-bank.co.uk
or alternatively: compliance@alpha-bank.co.uk

Alternatively, write to us, our postal address is:

Data Protection Officer
Alpha Bank London Limited
Capital House,
85 King William Street,
London, EC4N 7BL

4 Making a Complaint

You 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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

5 What types of information do we use?

In the course of providing our financial services to you, we collect, use, store the following about you:

| Category Types | Examples of personal data held under each applicable category |
|--|---|
| Personal details Data which identify the data subject and their personal characteristics. | Name, DOB, Addresses, Contact Details, Phone Numbers, email addresses ID numbers: National Insurance, Tax Codes copies of ID; Passport, Driver's License, Bank Details, |
| Family, lifestyle, social circumstances Any matters relating to the family of the data subject and the data subject's lifestyle and social circumstances. | Marital Status, Family, Next of kin details, Beneficiary Details, other Account Holders and Relationship, relevant information concerning financial difficulty, or medial information |
| Financial details Any matters relating to the financial affairs of the data subject. Examples are income, salary, assets and investments, payments, creditworthiness, loans, benefits, grants, insurance details, pension information. | Payroll, Loans, Benefits, Pension, Insurance Details, Credit Risk |
| Contact data | Postal address, Email address, Telephone numbers |
| Marketing and communications data | Marketing preferences from us, Marketing preferences from third parties, Communication preferences |

If a minor¹ is being added to a Joint Account, details to identify the individual will be required.

We do not generally collect special categories of personal data from our customers and clients. This means we do not collect data about, for example, your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and genetic and biometric data. We may collect information about your health, but only data on any vulnerable individuals that may have special requirements for us to operate their accounts. For example, we may collect and process information about mental or physical infirmity, in the event that an account must be operated by someone on your behalf.

In addition, we collect data which includes information to identify Politically Exposed Persons (PEPs).

We collect information about criminal convictions or offences where there is a legal or regulatory basis to do so, for example as part of our criminal fraud or Anti-Money Laundering (AML) processes, and where it is relevant as part of our risk policies & procedures.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

6 Consequences of not providing some types of information

Where we need to collect your personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with Payment Services). In this case we

¹ A minor is anyone under the age of 13.

may have to cancel the products or services on offer (including closing an account or opening a new account for you) but we will notify you if this is the case at the time.

7 How do we collect information about you?

Typically, we will collect information from you when you contact us directly or provide information for us to provide our products and services. We also collect information from and about you in the following ways:

- ✓ Through **direct interactions** when you give us your personal information by filling in forms or during correspondence with us. This includes when you:
 - Open a new account
 - Create an internet account
 - Apply for our products and services
 - Subscribe to our services
 - Meet with us in person or talk to us face to face
 - Complete questionnaires, for example to give us feedback
- ✓ Through **using our website** when we collect information using cookies or similar technologies which tell us about your equipment, browsing actions and patterns.
- ✓ Through **third parties** such as credit reference agencies and fraud prevention agencies. For more information regarding the disclosure of personal data and details to credit reference agencies, please see section 10 below. We may also receive personal information from other companies and organisations such as advisors and brokers. If you require a list of which third parties, please contact us via your Relationship Manager or using the Contact Details in section 3.

8 How we will use your personal information

We will only use your personal data when the law allows us to and we will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. We set out in the table below the ways in which we plan to use your personal information. We are only able to use your personal information if we have a legal or legitimate reason for doing so. The regulations require that we have a legal basis so that your privacy is protected. Most commonly we will use your information in the following ways:

- ✓ We have a **contract** with you. For example, we have agreed to provide banking or financial services to you and have a contractual agreement to do this.
- ✓ We have a **legal or regulatory obligation**. We need to use your personal information to comply with laws that assist in the prevention of financial crime and to comply with regulatory obligations. For example, we have a legal obligation to use your personal information for the purposes of fraud prevention, and to comply with anti-money laundering and anti-terrorism laws and regulations. This might include confirming your identity and source of wealth, as well as ensuring we provide you with necessary information so you understand the risk of the financial services we can provide.
- ✓ We, or a third party, have a **legitimate interest** in processing the information and your interests and fundamental rights do not override those interests. For example, we have a legitimate interest in processing your information to stop and prevent fraud, or to inform you of updates to these Terms, or to keep our records updated and to study how customers use our products/services

Our legitimate interests include:

- ✓ Processing for purposes or preventing fraud;
- ✓ Processing for marketing purposes;

- ✓ The transmission of personal data within the group for internal risk management or operational purposes;
- ✓ Processing for the purposes of ensuring network and information security, including preventing unauthorised access to electronic communications networks and stopping damage to computers;
- ✓ Reporting possible criminal acts or threats to public security to a competent authority.

In the table below, we set out all the ways we plan to use your personal information and the legal bases we rely on to do so.

| Purpose | Contractual | Regulatory | Legitimate Interest |
|--|--|---|--|
| To on-board you as a new customer, or open a new account for you | Yes, in accordance with our contractual arrangements | Yes, to fulfil our legal obligations to prevent financial crime | |
| To manage and operate your account | Yes, in accordance with our contractual arrangements | | |
| To monitor your account and investments on an on-going basis | Yes, in accordance with our contractual arrangements | To fulfil our legal obligations to stop and prevent financial crime | |
| To provide you with regular information about your investment | | To fulfil our regulatory obligations | |
| To contact you about other products and services we think you may be interested in | | | Necessary for our legitimate interests – to develop our products and services and grow our business. |
| To use data to improve our website | | | Necessary for our legitimate interests – to understand how our customers interact with our website |

We will only use your personal information for the reason for which we collected it. We will only use it for another reason if we believe that new reason is compatible with the original purpose. If we do need to use your personal information for an un-related purpose, we will tell you about it and explain the legal basis which allows us to do so.

In general, we do not rely on consent as a legal basis for processing your personal data other than:

- ✓ in relation to sending third party direct marketing communications to you; and
- ✓ parent or guardian consent in relation to opening accounts for minors.

We would only use your data in these circumstances if we have asked for your **consent** to use your information and you have agreed to give your consent. In relation to opening accounts for minors, consent means a freely given, informed and unambiguous indication of the parent's or guardian's wishes by a clear affirmative action, for example the signature of the parent or guardian on the Application Form.

Please note that you can withdraw your consent at any time – this is part of how the law protects your interests.

We will not disclose, transfer or sell your data to any third party for any purpose without your written consent.

9 Marketing

We will always seek your consent to use your personal information for marketing purposes. We will very clearly explain why we are seeking your consent and ensure that you are provided with a simple method of providing this – usually via a tick box on our website, a tick box in our client agreement, and terms of business.

You are free to change your mind at any time by notifying us using the forms available.

We can use your personal information to send you communications if we believe we have a ‘legitimate interest’. We are required to make an assessment with regards to the benefits for us weighed against how appropriate it is to contact you in this way and whether it would be unfair to you. We believe that as a commercial enterprise we do have a legitimate interest in contacting you about our products or services and we will only do so if we decide it would be of interest or beneficial for you.

10 Who we share your information with

We may need to provide information to third parties including, for example:

- ✓ where we are compelled or permitted or required to do so by law or by order of a court or government or administrative tribunal;
- ✓ where the disclosure is necessary to ensure performance of a contract between you and us, or where it is necessary for our legitimate interests, as described in section 8 above;
- ✓ where disclosure is made at your request or with your consent; or
 - When requested for Beneficial Ownership Information, we may disclose your personal details including name, address and contact details to issuers or their agents, of securities that you hold at Alpha Bank London Limited, or by our custodians
- ✓ to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this external privacy notice.

Please refer to the table in the section 8, “How we will use your personal information”, which explains how we use your data. The third parties we share your information with can be provided upon request.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may make searches with licensed credit reference agencies, which may well keep a record of such search. In particular, we may disclose personal data and details of how the Account is operated to credit reference agencies, if you:

- ✓ have fallen behind with repayments on a personal debt;
- ✓ do not dispute the amount owed;
- ✓ have not made satisfactory proposals to us regarding the repayment of the debt following formal demand; and/or
- ✓ where you have asked us to do so or where this is required by law.

Enquiries may be made with credit reference agencies and other service providers that we may use for the purpose of our anti money laundering and ‘know your client’ due diligence and in such cases the agencies will keep a record of our enquiries. However, we will only disclose to credit reference agencies information about you in the event of your defaulting on a debt. All information received may be used by other lenders in making credit decisions about you and other members of your household. You may view the information held about you by credit reference agencies by paying a fee. You may amend any inaccuracies in this information. You can contact us for further information on how to do this.

11 Sending your information outside of the EEA

The regulations which have been put in place to protect your privacy, apply throughout the EEA. The EEA is the European Economic Area which includes all the countries in the European Union plus Iceland, Liechtenstein and Norway. This means that any country within the EEA must meet the same privacy standards as the United Kingdom. All the personal information that we hold about you will be processed in the United Kingdom.

However, if personal information that we hold about you is transferred outside of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- where we use certain service providers, we may use specific contracts approved by the European Commission which gives personal data the same protection it has in Europe;
- where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

12 Storing your information

As a banking services provider, our terms are set out in our Terms of Business. We will need to keep your personal information (updated to ensure accuracy) to fulfil our contract. We also need to comply with EU and UK law, which often requires us to keep certain records - which will include certain personal information.

We will only retain your personal data for as long as it is necessary to fulfil the purposes we collected it for, including the purpose of satisfying any legal, accounting or reporting requirements. Our policy is that we keep basic information about our customers for six years after they cease being customers. In some circumstances you can ask us to delete your data. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. We will ensure all records are safely destroyed if we no longer need to retain them. We review our retention periods for personal information on a regular basis. We will tell you if we change the retention period, unless we have a legal or legitimate reason.

When we decide how long we will retain your personal information, we will take into account the amount, nature, sensitivity of your information and how we want to use it as well as the potential risk of harm being caused from unauthorised use or disclosure.

13 Your rights

You are provided with a number of different rights under the data protection laws in relation to your personal information. These allow you:

- request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- have your personal data corrected if it is inaccurate or incomplete at any time, though we may need to verify the accuracy of the new data you provide to us;
- request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (please see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may

not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;

- request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
- object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms; and
- withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of these rights, please contact us. Please note that you will not have to pay a fee to access your personal information or to exercise any of the other rights. We may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or we may refuse to deal with your request. We may also need to seek further information from you to confirm your identity before we release any personal information. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. This does not affect your right to make a complaint. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month (30 Days) of receipt. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14 Security

We have put in place appropriate security measures to protect your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

In particular, we ensure a level of security appropriate to potential risks involving your personal data, including:

- the pseudonymisation and encryption of your personal data where appropriate;



- ✓ ensuring ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- ✓ ensuring we can restore access to personal data in a timely manner if a physical or technical incident occurs; and
- ✓ regular testing, assessment and evaluation of the effectiveness of our technical and organisational measures to ensure your personal data is secure.