

## Privacy Policy

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### Looking after your information

One of the fundamental objectives of Euro Exim Bank, Group of companies and associate companies is protecting your privacy. We updated our Privacy Policy to reflect changes we made to strengthen your rights, increase transparency for how we protect your information, and comply with the European Union's General Data Protection Regulation (GDPR). These changes are effective 25 May 2018.

The Data Protection Act does not generally apply to companies but it does cover personal information relating to sole traders, partnerships and key account parties. Key account parties means individuals who are sole traders, proprietors, partners, directors, members, beneficial owners, trustees or other controlling officials of the business or organisation including signatories to the account. The Data Protection Act requires EURO EXIM BANK LTD Group of Companies and associated companies to manage personal information in accordance with the Data Protection Principles. Our Group of companies is required to process your personal information fairly and lawfully. This means that you are entitled to know how we intend to use any information you provide. You can then decide whether you want to give it to us in order that we may provide the product or service that you require. All our employees are personally responsible for maintaining customer confidentiality. We provide training and education to all employees to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

### Who we are

When your business applies for products and services provided by us, or banks with us, we may acquire personal information about you. Your personal information will be held by EURO EXIM BANK LTD Group of Companies.

### Our Group

More information on the Group can be found at <http://www.euroeximbank.co.uk> – For these purposes “associated companies” includes any subsidiary, affiliate or other firm directly or indirectly controlled from time to time by either EURO EXIM BANK LTD Group of Companies or us.

### Where we obtain your information

Your personal information will be held securely in EURO EXIM BANK LTD Group of Companies systems and archives so that we and any other companies in our Group that you have dealings with, either now or in the future, can manage your relationship with us. This will include information you provide when you apply to us, and any additional information provided by you or others in various ways, including:

in applications, emails and letters, during telephone calls, at face to face meetings, and conversations in branch, when registering for services, in customer surveys, when you participate in competitions and promotions, when using EURO EXIM BANK LTD Group of Companies websites, and during financial reviews and interviews, and at events you may attend.

from analysis (for example, the amount frequency, location, origin, and recipient) of your businesses payments and other transactions, and your use of services involving other EURO EXIM BANK LTD Group of Companies and what they know from operating your account (including the creation of profiles used to uniquely identify you when you use our online, mobile and telephony services) which are used to help us combat fraud and other illegal activity; and

information EURO EXIM BANK LTD Group of Companies receive from each other, from our business partners, or through other organisations (for example card associations, credit reference agencies, insurance companies, retailers, comparison websites, social networks, and fraud prevention agencies) whether in the course of providing products and services to you or otherwise, and from information we gather from your use of and interaction with our internet and mobile banking services and the devices you use to access them.

We will not retain your personal information for longer than is necessary for the maintenance of your account, or for legal or regulatory requirements.

### How we share your information

We may share the personal information we hold about you across the EURO EXIM BANK LTD Group of Companies and our agents for the following administrative activities: (a) providing you or your business with products and services and notifying you about either important changes or developments to the features and operation of those products and services; (b) responding to your enquiries and complaints; (c) administering offers, competitions, and promotions; (d) undertaking financial reviews; (e) facilitating the secure access to online platforms; and also for the following data sharing activities: (f) updating, consolidating, and improving the accuracy of our records; (g) undertaking transactional analysis; (h) arrears and debt recovery activities; (i) testing new systems and checking upgrades to existing systems; (j) crime detection, prevention, and prosecution; (k) evaluating the effectiveness of marketing, and for market research and training; (l) customer modelling, statistical and trend analysis, with the aim of developing and improving products and services; (m) assessing lending and insurance risks across the EURO EXIM BANK LTD Group of Companies; (n) managing your relationship with EURO EXIM BANK LTD Group of Companies. By sharing this information, it enables us, and other companies in the Lloyds Banking Group, to better understand you and your businesses' needs and run your accounts in the efficient way that you expect. Your personal information may also be used for other purposes for which you give your specific permission, or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998.

### When we may share your information

We will treat your personal information as private and confidential, but may share it with each other and disclose it outside the EURO EXIM BANK LTD Group of Companies if: (a) allowed by this Privacy Notice or any other agreement between us; (b) you consent; (c) if needed by our agents, advisers or others involved in running accounts and services for you and your business or collecting what you or your business owe Group companies; (d) needed by

subcontractors to help us manage your records; (e) HM Revenue & Customs or other authorities require it; (f) the law, regulatory bodies (including for research purposes), or the public interest permits or requires it; (g) required by us or others to investigate or prevent crime; (h) needed by market research companies to assist us in improving our products and services ; (i) to any other parties connected with your account (including guarantors);(j) required as part of our duty to protect your accounts; or (k) you use price comparison websites or other similar services to research or purchase financial products and services. These providers will use information about you and your relationship with us to help ensure you get the best results from their services, enabling you to make an informed choice. We will always ensure your personal information remains safe and secure.

## **Sharing your information with other companies**

If you were 'introduced' to us by a third party we will give them your contact details and sufficient information about you to help with their accounting and administration. Introducers may use these details to contact you about products and services unless you have asked them not to do so.

## **Using your information to help prevent terrorism and crime**

The Government also requires us to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities. As a result of this we may need to disclose information to government bodies.

## **Sharing your information to assist with asset buying or selling**

EURO EXIM BANK LTD Group of Companies may in the future wish to sell, transfer or merge part or all of their business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it. If so, and unless otherwise agreed between us, they may disclose your personal information to a potential buyer, transferee, or merger partner or seller and their advisers so long as they agree to keep it confidential and to use it only to consider the possible transaction. If the transaction goes ahead, the buyers, transferee or merger partner may use or disclose your personal information in the same way as set out in this notice.

## **Sharing your personal information with credit and debit card providers**

If you hold a credit, debit, charge or pre-payment card with us, we will share transaction details with our scheme providers (e.g. Visa or Mastercard).

## **Third party data**

If you give personal information about someone else (such as an employee for payment purposes) then you should not do so without their permission. Where information is provided by you about someone else, or someone discloses information about you, it may be added to any personal information that is already held by us and it will be used in the ways described in this privacy notice.

## **Sharing personal information between joint applicants**

When you open a business account or take a business product with EURO EXIM BANK LTD Group of Companies, this may mean that your personal information will be shared with the other people connected to that business. For example, transactions made by you may be seen by other people connected with your account in the business.

## **How we manage sensitive personal information**

The Data Protection Act defines certain information as 'sensitive' (racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, criminal proceedings and offences). In certain limited circumstances we may record and use 'sensitive' information about you. We will only do so if it is required to allow us to manage your accounts or meet any legal or regulatory requirements. As a customer, there may be times when you give us sensitive information. We may share it with other parts of the Group and our subcontractors to keep your records up to date.

## **How we manage information collected on credit and Debit card statements**

Some transactions that you or other card holders make on your businesses' card account may cause sensitive or confidential details to appear on your statement. By using your card to make such transactions you give us your consent to process this information.

## **Using companies to process your information outside the EEA**

All countries in the European Economic Area (EEA), which includes the UK, have similar standards of legal protection for your personal information. We may run your accounts and provide other services from centres outside the EEA (such as the USA and India) that do not have a similar standard of data protection laws to the UK. If so, we will require your personal information to be protected to at least UK standards. We may process payments through other financial institutions such as banks and the worldwide payments system operated by the SWIFT organisation if, for example, you make a CHAPS payment or a foreign payment. Those external organisations may process and store your personal information abroad and may have to disclose it to foreign authorities to help them in their fight against crime and terrorism. If these are based outside the EEA, your personal information may not be protected to standards similar to those in the UK.

## **Obtaining a copy of your information**

Under the Data Protection Act you have the right of access to your personal information. The Act allows us to charge a fee of £10 for this service. If anything is inaccurate or incorrect, please let us know and we will correct it. To request a copy of your personal information please write to Commercial Data Privacy Suite 1c, 1 Oaks Court, 1 Warwick Road, Borehamwood, Hertfordshire WD6 1GS UK.

## **Using your personal information to contact you about products and services.**

EURO EXIM BANK LTD Group of Companies will use your personal information so we can provide you with product details and offers that are more relevant to you. This may include products and services from companies outside of our Group if we believe they may be of interest to you or benefit you financially. This contact may continue after your relationship with us ends. We might contact you by mail, telephone, email, or text message unless you

have asked us not to. We may also display personalised messages when you use our internet banking service or mobile app. You can change your preferences at any time by calling us, writing to us, contacting your local branch or by updating them online.

## **Using Cookies**

In general, you can visit EURO EXIM BANK LTD Group of Companies websites without identifying who you are or revealing any information about yourself. However, cookies are used to store small amounts of information on your computer, which allows certain information from your web browser to be collected. Cookies are widely used on the internet and do not identify the individual using the computer, just the computer being used. Cookies and other similar technology make it easier for you to log on to and use our websites during future visits.

## **Passing your information to other companies for their own direct marketing**

Unless you have given us your consent, we will not provide information about you to companies outside our group to use for their own marketing purposes.

## **Viewing notifications**

Organisations must lodge a notification with their Regulator describing the purposes for which they process personal information. The details are publicly available from the Regulator's office and you can view ours at [http://www.ico.org.uk/what\\_we\\_cover/register\\_of\\_data\\_controllers](http://www.ico.org.uk/what_we_cover/register_of_data_controllers).

## **Changes to Privacy Notice**

We keep our Privacy Notice under regular review and we will reflect any updates within this notice.

## **Further Information**

For further information please contact Commercial Data Privacy, Suite 1c, 1 Oaks Court, 1 Warwick Road, Borehamwood, Hertfordshire WD6 1GS UK.