

Bank of Beirut (UK) Ltd: Privacy Notice

The following sections explain how and for what purposes the Bank of Beirut (UK) Ltd (referred to as “we”, “us” or “our”) will use your personal information. Please ensure that this information is provided to each individual identified in your account opening form (“the Application Form”) for an account (“the Account”) with us.

What Personal Information Do We Collect?

When the Application Form is submitted by an organisation (“the Company”) or by you we will collect and hold personal and financial information about you (as set out in the Application Form) and may obtain or receive such information about you in the future. The information we process about you will be obtained from various sources including:

- directly from you;
- from the Company;
- from the operation of the Account and any account(s) and service(s) separately provided to you by us, including account transactions;
- from our parent company/third parties who are companies and organisations which we may be partnered with who may have introduced you to us;
- from other organisations including credit reference and fraud prevention agencies; and
- from other persons who know you including joint account holders and persons with whom you are financially linked in the context of a particular product.

Such information may also include sensitive personal data, such as information relating to your health or criminal convictions or proceedings.

We may link information concerning your accounts with us to information relating to products and services we provide to you.

How Do We Use Your Personal Information?

We hold and process your personal data including sensitive personal data where we need to for the purposes of the product or services we provide to you (for example, foreign exchange services, online banking services, current and deposit accounts and loans) or where it is in our normal course of business to do so. This includes the following purposes:

- to make credit decisions about you and anyone to whom you are linked financially or other members of your household (which may involve credit scoring - further details below on this);
- managing credit and credit-related facilities;
- to consider and implement business, product and technology developments;
- to undertake statistical analysis, financial risk assessment, anti-money laundering checks (which may include telephoning you), compliance and regulatory reporting, fraud prevention and recovering debt;
- to help us identify products and services which may be of interest to the Company and/or you (unless you have asked us not to);
- systems testing and development; and/or
- where necessary to comply with our legal and regulatory obligations, court orders, regulatory, tax and law enforcement agency requests in the UK and elsewhere and for wider corporate governance and compliance purposes as are relevant to our operations in the UK and elsewhere including requests by overseas regulators, tax and law enforcement agencies.

Who Do We Share Your Personal Information With?

We will disclose information outside our group of companies only:

- if compelled to do so by law or regulatory obligations;
- as necessary to comply with court orders, regulatory, tax and law enforcement agency requests in the UK and elsewhere [and for wider corporate governance and compliance purposes as are relevant to our operations in the UK and elsewhere including by making disclosures in response to requests by overseas regulators, tax and law enforcement agencies];

- if appropriate, where you have provided your consent (which is not necessarily required to be in writing);
- where we have a public duty to disclose the information;
- to our agents or subcontractors for operational reasons;
- to any persons, including, but not limited to, insurers, who provide a service or benefits to you or for us in connection with your account(s);
- to licensed credit reference agencies and fraud prevention and other agencies (further details below on this);
- where we need to do so to comply with the requirements, codes or recommendations of any of our regulators;
- to confirm your identity for anti-money laundering purposes, which may include checking the electoral register; and/or
- to any person to whom we will or intend to transfer our rights or obligations and to actual or prospective purchasers in a proposed sale of our business or assets.

Credit Reference Agencies

We may disclose your information to licensed credit reference agencies to help make financial decisions for you and anyone with whom you are linked financially or other members of your household – our enquiries or searches may be recorded – and credit reference agencies may supply us with financial information, if you make several credit applications within a short time, this may temporarily affect your ability to obtain credit. When credit reference agencies receive a search from us they will place a search footprint on your credit file that may be seen by other lenders and other companies unrelated to us. These search footprints, personal data and (possibly) account performance data may be used by other lenders and credit reference agency customers. The credit reference agencies may add the details of our search and information we hold about you to their records relating to you.

A link between joint applicants and/or any individual identified as your financial partner (for example a spouse or financial associate with whom you have a personal relationship that creates a joint financial link in a similar way to a married couple, such as a person living at your address) will be created at credit reference agencies, which will link your financial records. You and anyone else with whom you have a financial link understand that each other's information may be taken into account in all future applications by either or both of you. We may link you both in our own records, take both your information into account in future applications by either or both of you, and continue this linking until for example one of you notifies us that you are no longer linked. This linking will continue until such time as your or the other relevant person successfully files a disassociation at the credit reference agencies. If your circumstances change such that you are no longer a financial unit with another person you should contact the credit reference agencies about this.

Credit searches and other information about you which is provided by us to the credit reference agencies may be used and disclosed by them to other companies unrelated to us for the purposes mentioned above and to enable those other companies to trace your whereabouts, recover debts that you owe and verify your identity. Records remain on file at the credit reference agencies for 6 years after they are closed, whether settled by you or defaulted.

Anti-Fraud Organisations

If false or inaccurate information is provided by you or on your behalf, if we suspect fraud or if fraud is identified, details will be kept in our records and also passed to fraud prevention agencies, law enforcement agencies and other organisations involved in crime and fraud prevention which may access and use this information. We and those other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- checking details on applications for credit and credit related or other facilities;
- managing credit and debit related accounts or facilities;
- recovering debt;
- checking details on proposals and claims for all types of insurance; or
- checking details of job applicants and employees.

We any other organisations may access and use from other countries the information recorded by fraud prevention agencies and credit reference agencies. If you would like details of the agencies from which we obtain and record information about you, please write to: Bank of Beirut (UK) Ltd, 17a Curzon Street, London W1J 5HS

You can contact the UK's credit reference agencies (CallCredit, Equifax and Experian) to find out what information they hold about you. The information they hold may not be the same so you may wish to contact more than one. They are entitled charge you a small statutory fee.

- (1) CallCredit, Consumer Services Team, PO Box 491, Leeds, LS3 1WZ or call 0870 0601414
- (2) Equifax PLC, Credit File Advice Centre, PO Box 3001, Bradford, BD1 5US or call 0870 010 0583 or log on to www.myequifax.co.uk
- (3) Experian, Consumer Help Service, PO Box 8000, Nottingham NG80 7WF or call 0844 4818000 or log on to www.experian.co.uk.

Other Data Sharing With Third Parties

From time to time we will engage service providers which may include group companies, agents and subcontractors to provide services to us. They will have access to, and will process, your information on our behalf to provide such services.

Your personal data and sensitive personal data may be transferred to countries or territories outside the European Economic Area, including for example to our service providers, agents, subcontractors and to actual or prospective purchasers of our business or assets. Steps will be taken to protect it where needed. For example, depending on the country of import, contractual obligations may be put in place to seek to ensure that the recipients protect your personal data in accordance with obligations imposed on us by data protection law.

We may anonymise or aggregate personal information in such a way as to ensure individuals cannot be identified from it. We may use anonymised/aggregated data for statistical analysis and administration including analysis of trends, to tailor our business and our service offerings, to conduct risk assessment and to analyse costs and charges. We may share anonymised/aggregated data with the third parties mentioned above.

Marketing

Subject to data protection law and your consent where needed, we (meaning Bank of Beirut (UK) Ltd and its subsidiaries) may contact you by post, phone, email or SMS text, or other means as may become relevant from time to time, to inform you about products and services which may be of interest to you and which are supplied by any part of our group of companies or by carefully selected third parties. We may also share your personal data with those carefully selected third parties so that they can contact you directly. You can inform us at any time if you do not want to receive marketing information from us or our subsidiaries. To do this, contact us at Bank of Beirut (UK) Ltd, 17a Curzon Street, London W1J 5HS. To do this in respect of the third parties you would need to contact them directly. The sender of the marketing and details of how to unsubscribe will usually be identified in the communication itself.

Your Rights

You are entitled to a copy of the personal information we hold about you on payment of a fee. To do this, contact us in writing at Bank of Beirut (UK) Ltd, 17a Curzon Street, London W1J 5HS. Please enclose a cheque for the fee (currently £10). For further information on your rights under the Data Protection Act 1998, you can contact: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or visit www.ico.gov.uk

We may record and/or monitor telephone calls to enhance security, to help address complaints, improve our customer service, for staff training purposes, as required for compliance with regulatory rules, to prevent or detect crime or any unauthorised use of our telephone systems, and to evidence instructions received by telephone (in each case to the extent the same is in permitted by applicable laws and regulations).

We need the information we hold about you to be accurate and up to date. Please help us by informing us promptly of any changes to your personal circumstances or details.