

2018 Bank of Beirut (UK) Ltd: Privacy Notice

Version 1.0. May 2018

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.

‘You’ relates to any person whose data is processed in relation to the banking services provided by Bank of Beirut (UK) Ltd.

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.

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

The Information We Process

We collect and process various categories of personal information at the commencement of and during your relationship with us. We will always limit the collection and processing of data to only what is necessary and where we have a legal right to do so.

Personal Information May Include:

- Basic personal information, including name and address, date of birth and contact details
- Financial information, including account and transactional information and history
- Information about your family, lifestyle and social circumstances (such as dependents, marital status, next of kin and contact details)
- Information about your financial circumstances, including personal wealth, assets and liabilities, proof of income and expenditure, credit and borrowing history and needs and goals
- Education and employment information
- Goods and services provided
- Visual images and personal appearance (such as copies of passports or CCTV images); and

where permitted by law, we may process information about criminal convictions or offences and alleged offences for specific and limited activities and purposes, such as to perform checks to prevent and detect crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions This may involve investigating and gathering intelligence on suspected financial crimes, fraud and threats and sharing data between banks and with law enforcement and regulatory bodies.

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, trade finance, 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

- 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)
- With third parties providing services to us, for example market analysis and benchmarking, correspondent banking
- 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 other databases
- 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. For more information regarding how Credit Reference Agencies manage their data <https://www.callcredit.co.uk/crain>.

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.

The Bank of Beirut (UK) Ltd does not make judgments based on automated decision making. However be advised that you have rights in relation to automated decision-making, including a right to appeal if your application is refused and please get in touch with us if you believe you have been affected by automated decision making.

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 and 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 to 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.

Legal Obligations And The Processing Of Your Data

On application for a product or service (and over the course of the duration of your relationship with us), we must collect and process personal information about you.

It is important to note, if you do not provide us with the required information, the bank cannot operate your account and/or provide products and services to you.

Processing Is likely To Include:

- Confirmation of your identity
- Sharing data with police, law enforcement, tax authorities where legally required
- Investigate and resolution of complaints
- Undertake monitoring for the purpose of preventing and identifying crime
- To comply with laws and regulations
- The bank will share data with other banks to help recover funds that have entered your account as a result of a misdirected payment
- Communications including updates to product and service terms and conditions
- Analysis of customer data for the purposes of maintaining, improving data quality
- Investigate and report on incidents or emergencies on properties and premises

Contractual Obligation

- To consider and process applications for products or services
- The provision and administration of products and services for the duration of the relationship with the bank
- Communication relating to products and services you receive

Legal Obligation

- Confirmation of your identity
- The undertaking of continuous screening to aid the detection and prevention of crime
- To comply with all relevant laws for example relating to money laundering, fraud, terrorist financing, bribery and corruption
- Share data with regulatory authorities
- Mandatory communications
- Complaints investigation

Legitimate Interests Of The Data Controller

We may process your information where it is in our legitimate interests to do so as an organisation and without prejudicing your interests or fundamental rights and freedoms.

- Assess and process applications for products or services;
- In the course of the administration of products and services throughout your relationship with us
- Electronic communications sent to us and telephone conversations with us may be monitored and/or recorded for training purposes, internal investigations, legal reasons, to check instructions, or to meet regulatory requirements
- Maintenance of our relationship with you and for customer service
- To facilitate the day-to-day running of our business

- Ensure business continuity and disaster recovery and responding to information technology and business incidents and emergencies
- To safeguard network and information security
- For the provision and investigation of Bank of Beirut' material risks
- Perform general, financial and regulatory accounting and reporting
- Protect our legal rights and interests
- Manage and monitor our properties and branches

It is in the banks interest to ensure that we provide you with the most appropriate products and services. This may require;

- Analysing our customers' behaviour and history
- Analysis on customer complaints
- monitor the performance of products and services

It is in the 'banks' interest to manage our risk and to determine the products and services we can offer. Additionally it is in the banks interest to protect our business from financial crime. This may include;

- Carrying out financial, credit and insurance risk assessments
- Manage and take decisions about your accounts
- Complete screening (in addition to statutory requirements) on customers and potential customers, and associated persons

Marketing

Subject to your consent, we (meaning Bank of Beirut (UK) Ltd) 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 with your consent 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 be identified in the communication itself.

Your Rights

You are entitled to a copy of the personal information we hold about you. To do this, contact us in writing at Bank of Beirut (UK) Ltd, 17a Curzon Street, London W1J 5HS. For further information on your rights under the GDPR, 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).

Your Rights - Summary

Access	You have a right to get access to the data we hold about you. There is no charge for access to your personal data. To obtain a copy of the personal information we hold about you, please write to: at FAO Data Protection Officer Bank of Beirut (UK) Ltd, 17a Curzon Street, London W1J 5HS
Rectification	You have a right to rectification erroneous personal information and to update incomplete personal information. Additionally you have the right to request that data processing be restricted. Importantly if you request us to restrict processing your information, we may have to suspend the operation of your account.
Erasure	You have a right to request that we delete your personal information. If: <ul style="list-style-type: none">• we no longer need to process your information for the purposes for which it was provided;• we have requested your permission to process your personal information and you wish to withdraw your consent; or• we are not using your information in a lawful manner. Importantly if you request us to restrict processing your information, we may have to suspend the operation of your account.
Restriction	You have a right to request us to restrict the processing of your personal information. If, <ul style="list-style-type: none">• any of the information that we hold about you is inaccurate;• we no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims; or• we are not using your information in a lawful manner.
Portability	You have a right to data portability. You have a right to receive the personal information you provided to us in a portable format. Importantly, if you request us to restrict processing your information, we may have to suspend the operation of your account.

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.

If you are concerned about how your information is used, please contact us at FAO Data Protection Officer, Bank of Beirut (UK) Ltd, 17a Curzon Street, London W1J 5HS. Alternatively, you have a right to complain to the Information Commissioner's Office www.ico.gov.uk