

PRIVACY NOTICE – SERVICE USERS

1. ABOUT THIS NOTICE

You are receiving this notice because Crown Agents Bank Limited (“**CAB**”, referred to as “**we**” within this notice), provides certain services (“**Services**”) to an entity (the “**Customer**”), on whose behalf you access our Services as an Authorised Person. Through your use of the Services, we collect, use and are responsible for certain personal information about you under the UK Data Protection Act 2018 and the UK General Data Protection Regulation (collectively, “**GDPR**”).

CAB respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you engage with the Services on behalf of the Customer either via the website, desktop, or mobile applications, and tell you about your privacy rights and how the law protects you. It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

CAB is a “**data controller**” for the purposes of this notice as such term is defined in the GDPR. Capitalised terms used in this notice have the meaning ascribed to them in our General Terms and Conditions, unless otherwise defined in this notice.

2. OUR COLLECTION AND USE OF YOUR PERSONAL INFORMATION

We collect personal data about you when you register for User Security and access the Services. We collect this personal information from you either directly, or indirectly, such as through your activity while using the Services.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity data, which includes your name, your email address, and any other personal data provided by you.
- Technical data, which includes your internet protocol (IP) address, your browser type and version, your time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Services. This data is collected through analytics providers, and by using cookies. More information about our use of cookies is available at: <http://www.crownagentsbank.com/cookie-policy/>
- Usage data, which includes information about how you use the Services.

We do not collect any special categories of personal data about you through your use of the Services, nor do we collect any information about criminal convictions and offences.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. If we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this notice.

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with the Customer.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, we may use your identity, technical and usage data to deliver the Services. We may use your technical and usage data to administer and protect our business and the Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data.

4. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Services may become inaccessible or not function properly. For more information about the cookies we use, please see <http://www.crownagentsbank.com/cookie-policy/>.

5. CHANGE OF PURPOSE

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. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

6. PROVIDING INFORMATION TO THIRD PARTIES

We ensure that any third-party service providers we use are required to take appropriate security measures to protect your personal data in line with our policies and we only permit them to process your personal data for specified purposes and in accordance with our instructions. We will not share any of the information you provide to us with any third parties for marketing purposes.

7. TRANSFER OF YOUR PERSONAL DATA OUT OF THE EEA

We do not typically need to transfer any of your personal data to which this notice applies outside the UK and/or the EEA, but this may happen in connection with some Services. If we transfer personal data covered by this notice to external third parties based who are not in the UK and are outside the EEA, we will ensure that adequate safeguards are in place, as required under the GDPR.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. DATA SECURITY

We have put in place security measures to prevent 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 information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

10. PROCESSING IN LINE WITH YOUR RIGHTS UNDER THE GDPR

Under certain circumstances, by law, you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below);
- Object to processing of your personal information 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;
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- Request the transfer of your personal information to another party.

11. DATA PRIVACY MANAGEMENT

We have appointed an internal team to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact us in the first instance: email: dataprotection@crownagentsbank.com; telephone: +44 (0)20 3903 3000.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing at:

dataprotection@crownagentsbank.com, or
Data Protection
Crown Agents Bank
Quadrant House
The Quadrant
Sutton
SM2 5AS.

12. BREACHES OF DATA PROTECTION PRINCIPLES

We hope that we can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

13. CHANGES TO THIS PRIVACY NOTICE

This notice was last updated on 1 April 2021. We reserve the right to vary this notice from time to time by publishing a new version on our website.