

Data Protection Privacy Notice

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.

1 What Is Personal Information?

Personal information means 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.

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. If you have any questions about this Privacy Notice or the information we hold about you, 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

Or 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

If you do have a complaint please contact us in the first instance, using the contact details above. You also 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.

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

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

We do collect any special categories of personal data from our customers and clients in accordance with regulatory and legal requirements. This includes information to identify Politically Exposed Persons (PEPs), and any vulnerable individuals that may have special requirements for us to operate their accounts.

We collect information about criminal convictions or offences where relevant as part of our criminal fraud, Anti-Money Laundering (AML) and risk policies & procedures.

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 provide the goods or services you asked for. In this case we may have to cancel the product or services, including closing an account or unable to open a new account for you, but we will tell you if this is the case.

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

¹ A minor is defined in the Terms of Business

- 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. 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 only obtain, use and keep personal information where we need it for a specific 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 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, 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 have asked for your **consent** to use your information and you have agreed to give your consent. **Please note that you can withdraw your consent at any time – this is part of how the law protects your interests.**
- We, or a third party, have a **legitimate interest** in processing the information and your interests and fundamental right do not override those interests. For example, processing your information to stop and prevent fraud.

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 a un-related purpose, we will tell you about it and explain the legal basis which allows us to do so.

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

- Operational processes
- To assist in the detection or prevention of crime, or
- For safeguarding national security

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.

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.

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.

Our policy is to keep records for up to 10 years after you are no longer a client. 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:

- To access your information;
- To request we correct your information;
- To request that we erase your information;
- To object to the processing of your information;
- To request a restriction in the processing of your information;
- To request a transfer of your information; and
- To 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 does not affect your right to make a complaint.

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. We have a procedure to deal with any suspected personal data breach and will notify you, where we are legally required to do so.