

Jordan International Bank Plc

Privacy Notice for Customers, Website Users and Recruitment Candidates¹

For the purpose of data protection legislation, Jordan International Bank Plc (also referred to in this document as “Jordan International Bank”, “the Bank”, “we”, “our” or “us”) is the data controller responsible for the collection and use of your personal data. Personal data is any information that relates to an identified or identifiable individual.

This Privacy Notice explains why and how the Bank collects, processes and protects your personal data. It continues to apply even if your agreement for the Bank’s products and services ends or your relationship with the Bank ends. This Privacy Notice also tells you about your privacy rights and how the law protects you.

In order to comply with data protection legislation, the Bank must manage your personal data fairly, lawfully and transparently. This will ensure that you are well informed about the Bank’s use of your personal data and your rights in respect of the personal data which you provide.

Contact Us

Your personal data will be held by Jordan International Bank Plc. The Bank is registered in England and Wales under company number 01814093 and the Bank’s registered office address is Almack House, King Street, London, England, SW1Y 6QW.

If you have any questions, or would like more details about how the Bank uses your personal information, please contact us.

- By email at compliance@jordanbank.co.uk
- By writing to the Bank, for the attention of the Head of Compliance at Jordan International Bank Plc, Almack House, King Street, London, SW1Y 6QW.

Information for Corporate Customers

If you are a corporate customer of the Private Banking, Structured Property Finance, Trade Finance and/or Treasury Department, your personal information will be collected and used in accordance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and this Privacy Notice.

The Type of Personal Data Collected by the Bank

The Bank will only collect personal data in line with relevant legislation and regulations. The type of information the Bank collects will vary depending on the products or services which you apply for, currently hold or have held in the past. Most of this data will be provided by you. The Bank may also collect information about you when you interact with the Bank, for example when you visit the Bank, visit the Bank’s website or telephone the Bank.

¹ This Privacy Notice for recruitment purposes applies to potential candidates for employment or internship.

The Bank may also collect personal data from a range of sources including third parties, such as credit rating agencies or publicly available sources. The information collected by the Bank may include:

Personal Data	Description (Examples)
Basic Personal Data	<ul style="list-style-type: none"> • Title and full name • Information concerning your identity e.g. photo ID, passport information, national insurance number, national ID card, tax identification number • Marital status, family, social and other circumstances where relevant such as a mortgage application (e.g. number of dependents, information about any guarantor) or a job application; • Contact details (your home address, any other contact address, your address history, home and mobile telephone numbers, email address) • Date of birth • Gender • Tax residency details • Immigration status
Financial Status	<ul style="list-style-type: none"> • Source of wealth and source of income details (including employment history if necessary) • Your financial details including current commitments
Financial Transactions	<ul style="list-style-type: none"> • Bank account details • Details about payments to and from your account(s) with us
Agreement	<ul style="list-style-type: none"> • Contract and terms and conditions relating to the product(s) and service(s) the Bank provides to you
Audit and Monitoring	<ul style="list-style-type: none"> • IP address of your computer when you visit the Bank's website • Phone calls • Your image on CCTV when you visit the Bank's premises
Sensitive/Special Categories of Data	<ul style="list-style-type: none"> • Personal information which the Bank obtains from fraud prevention agencies/ credit rating agencies • Special categories of personal data such as regarding your health if you are a vulnerable customer • Data related to criminal offences and proceedings in accordance with the law • Where it is needed in the public interest, such as for equal opportunities monitoring (for recruitment purposes only)
Recruitment and On-Boarding Information (For Recruitment Purposes Only)	<ul style="list-style-type: none"> • Personal data about you in the form of a curriculum vitae, application form, and communications from employment agencies and/or previous employers • Information about your current contract of employment including start and end dates, role and location, working hours, details of promotion, remuneration, salary details and professional memberships
Other	<ul style="list-style-type: none"> • Other information that you provide by filling in forms or by communicating with the Bank, whether face-to-face, by telephone phone, email, online or otherwise

How the Bank Obtains Your Personal Information

The majority of your personal data will be provided directly by you to the Bank. This will include the data that the Bank obtains from you at account opening as well as during your ongoing customer relationship with the Bank, for example from transactions on your account(s).

Where relevant, the Bank may also obtain your personal data from other sources such as:

- Publicly available sources, such as online registers or directories
- Fraud prevention agencies
- Credit rating agencies
- Law firms
- Other banks/financial institutions
- People appointed to act on your behalf
- Referrals from third parties
- Debt recovery and tracing agents
- Police and law enforcement agencies
- Previous employer(s) (for recruitment purposes only)
- Employment agencies (for recruitment purposes only)

How the Bank Uses Your Personal Information

To comply with data protection legislation, the Bank must rely on at least one of the following grounds when processing your data:

- **Contract:** To fulfil a contract the Bank has with you.
- **Legal obligation:** To comply with a legal obligation.
- **Consent:** You have given clear consent for the Bank to process your personal information for a specific purpose. You are able to remove your consent at any time by contacting the Bank using the details set out in the 'Contact us' section at the start of this Privacy Notice.
- **Legitimate interest:** Processing your personal information is necessary for the Bank's legitimate interests, which the Bank is obliged to communicate to you. You have the right to object to this processing. However please bear in mind that, if you object, this may affect the Bank's ability to offer you certain products and services.

The Purpose of Processing Personal Data	Lawful Basis	The Bank's Legitimate Interests
To deliver the Bank's products and services	<ul style="list-style-type: none"> • To fulfil a contract the Bank has with you • The Bank's legitimate interests 	<ul style="list-style-type: none"> • To be able to deliver products, services and obligations effectively to you • To administer your accounts and to process your transactions.
To undertake mandatory 'Know Your Client' checks	<ul style="list-style-type: none"> • The Bank's legal obligations • The Bank's legitimate interests 	<ul style="list-style-type: none"> • Complying with the Bank's regulatory requirements • Protecting the Bank from financial crime
To manage the Bank's relationship with you	<ul style="list-style-type: none"> • To fulfil a contract the Bank has with you • To comply with a legal obligation • The Bank's legitimate interests • Your consent 	<ul style="list-style-type: none"> • To be able to contact you • To make a decision about your recruitment and, if applicable, the terms of your contract (for recruitment purposes only) • If you receive an offer from the Bank, we may conduct a background check in accordance with law (for recruitment purposes only) The Bank may wish to remain in contact with you and consider you for future employment opportunities (for recruitment purposes only)
To make suggestions and recommendations to you about products or services that may be of interest to you	<ul style="list-style-type: none"> • Your consent 	
To prevent and detect any fraudulent and other criminal activity and to comply with all relevant laws and regulations such as anti- money laundering, anti-terrorism and immigration	<ul style="list-style-type: none"> • The Bank's legal obligations • The Bank's legitimate interests 	<ul style="list-style-type: none"> • Complying with the Bank's regulatory requirements • Protecting the Bank from financial crime
To analyse, assess and improve the Bank's services to you and other customers	<ul style="list-style-type: none"> • The Bank's legitimate interests 	<ul style="list-style-type: none"> • To be able to deliver products, services and obligations effectively to you and other customers

The Purpose of Processing Personal Data	Lawful Basis	The Bank's Legitimate Interests
To handle enquiries and complaints	<ul style="list-style-type: none"> • To fulfil a contract the Bank has with you • The Bank's legitimate interests 	<ul style="list-style-type: none"> • Complying with the Bank's regulatory requirements • To be able to deliver products, services and obligations effectively to you
Training purposes	<ul style="list-style-type: none"> • The Bank's legitimate interests 	<ul style="list-style-type: none"> • To be able to deliver products, services and obligations effectively to you
To carry out checks in relation to your creditworthiness	<ul style="list-style-type: none"> • The Bank's legitimate interests • To fulfil a contract the Bank has with you 	<ul style="list-style-type: none"> • To assess your credit worthiness and make responsible lending decisions • Complying with the Bank's regulatory requirements
To protect the Bank's legal rights and comply with legal and regulatory obligations and expectations	<ul style="list-style-type: none"> • The Bank's legal obligations 	
To correspond with solicitors, surveyors, other lenders and third party intermediaries	<ul style="list-style-type: none"> • To fulfil a contract the Bank has with you • The Bank's legitimate interests 	<ul style="list-style-type: none"> • To be able to deliver products, services and obligations effectively to you
To share your personal information with other payment services providers with your consent	<ul style="list-style-type: none"> • Your consent • To fulfil a contract the Bank has with you 	
To deal with requests from you to exercise your rights under data protection laws	<ul style="list-style-type: none"> • To fulfil a contract the Bank has with you 	
Where you have a lending product that is in default, taking appropriate steps to recover the debt	<ul style="list-style-type: none"> • The Bank's legitimate interests 	<ul style="list-style-type: none"> • To trace and recover debts owed to the Bank
To test and improve the performance of the Bank's products, services and internal processes	<ul style="list-style-type: none"> • The Bank's legitimate interests 	<ul style="list-style-type: none"> • To be able to deliver products, services and obligations effectively to you and other customers
To share your personal information with third parties such as your accountants, lawyers or other professional advisers based on your consent	<ul style="list-style-type: none"> • Your consent • To fulfil a contract the Bank has with you 	

Sharing Your Personal Information

In relation to how the Bank uses your information as described above, the Bank may share your information with others where necessary, lawful and applicable to do so including:

- UK law enforcement agencies, regulators and authorities such as HM Revenue & Customs (HMRC), the Financial Conduct Authority (FCA), the Prudential Regulation Authority (PRA), the UK Financial Services Compensation Scheme (FSCS), the Financial Ombudsman Services (FOS), the Information Commissioners Office (ICO) and the National Crime Agency (NCA)
- Overseas law enforcement agencies and authorities
- Fraud prevention agencies
- Credit rating agencies
- Other financial institutions and payment services providers
- Joint account holders, trustees, beneficiaries, executors
- Legal and other professional advisers and auditors
- Courts and other relevant organisations
- Service providers who work for the Bank or provide services to the Bank
- People who are guarantors for any amounts that you owe to the Bank
- Employment agencies (for recruitment purposes only)

Marketing

Where the Bank has your consent to communicate with you by certain channels, the Bank may contact you by post, email or phone about the Bank's products and services that we believe you may be interested in. You can withdraw your consent at any time by contacting the Bank.

You can object to further marketing communications at any time by selecting the "unsubscribe" link at the end of all of the Bank's marketing emails, or by contacting the Bank using the communication details set out at in the 'Contact Us' section at the start of this Privacy Notice.

Merger and Acquisitions

The Bank may choose to sell, transfer or merge parts of its business or our assets, in which case the Bank will disclose your personal information to the prospective buyer and other parties involved in such business or asset sale, subject to the terms of this Privacy Notice. If Jordan International Bank or substantially all of its assets are acquired by a third party, your personal information will be one of the transferred assets.

Recording

The Bank may use the following recordings to check your instructions, analyse and improve the Bank's services, train the Bank's staff, manage risk or prevent and detect fraud and other crimes.

- Your telephone conversations with the Bank
- Your image on CCTV when you visit the Bank's premises
- Your IP address when you visit the Bank's website. The Bank tracks website traffic with Google Analytics to collect standard internet log information such as IP addresses in the Bank's legitimate interest to discover historical errors and develop and improve the Bank's website. No attempt is made to discover the identities or nature of those visiting the Bank's website.

Cookies

The Bank may use cookies and other similar technologies on its website to recognise you, remember your preferences and provide personalised content to you. The Cookie Policy on the Bank's website contains more details about how the Bank uses cookies.

Keeping Your Information Secure

The Bank takes reasonable steps, including physical, technical and organisational measures, to protect your personal information from unauthorised access and against unlawful processing, accidental loss, destruction and damage. In this respect, the Bank may use encryption and other forms of security measures to keep your information safe and secure.

Transferring Your Personal Information outside the UK and the European Economic Area

The Bank may transfer your personal information to one or more countries outside the UK and the European Economic Area ("EEA"), where its shareholders (the Housing Bank for Trade and Finance and Arab Jordan Investment Bank) or its service providers or suppliers maintain operations. If your personal information is disclosed to third parties outside the UK and the EEA, these third parties may be based in territories that may not have equivalent data protection laws and may not be subject to an adequacy decision by the UK and European authorities.

In these circumstances, the Bank will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisational, contractual or other lawful means.

The Bank may transfer your personal information outside the UK and the EEA:

- in response to a request made by you;
- to the Bank's selected third party service providers or suppliers ;
- where the Bank is legally required to do so; and
- in order to facilitate the operation of Jordan International Bank Plc, where it is in the Bank's legitimate interests and the Bank has concluded these are not overridden by your rights.

Please contact the Head of Compliance at compliance@jordanbank.co.uk for further information.

How Long the Bank Stores Your Personal Information

The Bank will hold your personal information while you are a customer or have a relationship with the Bank. The Bank will also retain your personal information for a certain period after your application or relationship with the Bank has ended, and once your account is closed, in order to meet the Bank's legal or regulatory requirements.

The Bank will keep your information in line with its Data Retention and Disposal Policy. For instance, your personal information will normally be kept in the Bank's core banking system for a period of eight years from the end of the Bank's relationship with you. This enables the Bank to comply with its legal and regulatory requirements.

Following the closure of your account or the ending of your relationship with the Bank, your personal information will only be used for relevant legal or regulatory purposes and the Bank will ensure that your personal data is adequately protected. If the Bank does not need to keep personal information for this period of time, the Bank may securely dispose of it or anonymise it.

Your Data Protection Rights

Your rights under data protection law include:

- **Your right of access** - You have the right to ask for copies of your personal information.
- **Your right to rectification** - You have the right to ask the Bank to rectify personal information you think is inaccurate. You also have the right to ask the Bank to complete information which you think is incomplete.
- **Your right to erasure** - You have the right to ask the Bank to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask the Bank to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask the Bank to transfer the personal information you gave to the Bank to another organisation, or to you, in certain circumstances.

In most circumstances, you are not required to pay a fee for exercising your rights. If you make a data subject access request, the Bank has an obligation to respond without undue delay, but at the latest, within one month of the request. Subject to the volume or complexity of the request, this deadline may be extended by two months, but an initial response will be provided within one month indicating whether such extension will be necessary.

More Details about Your Personal Information

If you wish to exercise any of the above rights in relation to the personal information the Bank holds about you or wish to change your preferences at any time, please contact the Bank by email, by writing to the Bank or by telephone:

- Email at compliance@jordanbank.co.uk (for requests)
complaints@jordanbank.co.uk (for complaints)
- Writing to the Bank, for the attention of the Head of Compliance, at Jordan International Bank Almack House, King Street, London, England, SW1Y 6QW
- Telephoning the Bank's Compliance Department on +44 20 3144 0200

Please note that the Bank may require you to verify your identity before allowing you to access your personal information.

How to Complain

If you have any concerns about the Bank's use of your personal information, you can make a complaint by contacting the Bank using the details set out in the 'More Details About Your Personal Information' section above.

You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how the Bank has used your personal data. The ICO is the independent supervisory authority for data protection in the UK. The Information Commissioner's Office's contact details are:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Information Commissioner's Office Helpline: 0303 123 1113

Information Commissioner's Office website: <https://www.ico.org.uk>