

# Privacy Policy

## Jordan International Bank PLC Customer Privacy Statement

### Introduction

Your personal information will be held by Jordan International Bank PLC ("**Jordan International Bank**", "**we**", "**our**" or "**us**"). We are registered in England and Wales under company number 01814093 and our registered office address is at Almack House, King Street, London, England, SW1Y 6QW.

This privacy statement explains why and how we process and protect the personal information that you provide to us. This privacy statement also tells you about your privacy rights and how the law protects you.

We are committed to providing banking services and want you to have trust and confidence in the way we use your personal information. In order to comply with data protection law, we must manage your personal information fairly, lawfully and transparently. This will ensure that you are well informed about our uses of your personal information and your rights in respect of the personal information you provide.

For the purposes of EU and UK data protection legislation, we are the data controller responsible for the collection and use of your personal information as set out in this privacy statement. If you have any questions, or want more details about how we use your personal information, please contact us:

- By email at: [compliance@jordanbank.co.uk](mailto:compliance@jordanbank.co.uk).
- By writing to us, for the attention of our Compliance Officer, at: Almack House, King Street, London, England, SW1Y 6QW.

**Personal information we collect from you**  
**Where we collect your personal information from**  
**What we use your personal information for**  
**Who we share your personal information with**  
**Marketing**  
**Transferring your personal information outside the EEA**  
**How long we keep your personal information**  
**Your rights**  
**Contact us**

### Personal information we collect from you

When you apply or enquire about a product or service and throughout our relationship with you, you will provide various categories of personal information to us. We collect this personal information to ensure we can efficiently and lawfully provide the relevant product or service to you. Details of the categories of personal information we collect are listed in the table below.

Click the headings below for further details relating to the categories of personal information our Personal Banking and Structured Property Finance teams may collect about you and for what purposes:

- [Private Banking](#)
- [Structured Property Finance](#)

<b>Categories of personal information collected</b>	<b>Description</b>
Basic Contact Information	<ul style="list-style-type: none"> <li>• Name</li> <li>• Residential or business address</li> <li>• Email address</li> <li>• Contact telephone number</li> </ul>
Financial	<ul style="list-style-type: none"> <li>• Your financial position including current commitments</li> <li>• Status</li> <li>• History</li> </ul>
Socio-Demographic	<ul style="list-style-type: none"> <li>• Age</li> <li>• Gender</li> <li>• Work or profession</li> <li>• Employer contact details</li> <li>• Nationality</li> </ul>
Transactional	<ul style="list-style-type: none"> <li>• Details about payments to and from your accounts with us</li> </ul>
Contractual	<ul style="list-style-type: none"> <li>• Details about products or services we provide to you</li> </ul>
Locational/ online identifier	<ul style="list-style-type: none"> <li>• Information contained on your bank statement in respect of purchases made by you using your bank card provided by us</li> <li>• IP address</li> </ul>
Communications	<p>Information we learn about you from:</p> <ul style="list-style-type: none"> <li>• Letters</li> <li>• Faxes</li> <li>• Emails</li> <li>• Calls</li> <li>• Face-to-face conversations you have with us</li> </ul>
Documentary Data	<p>Details about you contained in any of the following documents:</p> <ul style="list-style-type: none"> <li>• Passport</li> <li>• Driving licence</li> <li>• Birth certificate</li> </ul>
National Identifier	<ul style="list-style-type: none"> <li>• A code provided by a government to identify who you are, including but not limited to a National Insurance number or social security number</li> </ul>
Sensitive/special categories of data	<ul style="list-style-type: none"> <li>• Any information revealing your political opinions received as part of identity checks</li> </ul>

## **Where we collect your personal information from**

This section lists all the ways we receive your personal information.

### ***Personal information you provide to us:***

- When you apply for our products and services
- During the course of providing instructions to us
- As part of the on-boarding process including financial background checks and approving your identity through the 'Know Your Client' process
- When you talk to your relationship manager or another member of our team on the phone or in branch, including recorded calls and notes we make
- When we operate your account(s)
- When you use our website
- In emails and letters

### ***Personal information we collect when you use our products and services:***

The personal information we collect includes details about how and where you access our products and services, and account activity that is shown on your statement.

- Payment and transaction data - this includes the amount, frequency, type, location, origin and recipients.
- Profile data - this includes the security details you create and use to connect to our services. It also includes your settings and marketing choices.

### ***Personal information we receive from third parties:***

The majority of your personal information will be provided directly by you to us often in the ways noted above. There may be instances where we receive your personal information from external individuals or third party intermediaries acting on your/our behalf including:

- Accountants
- Tax Advisers
- Lawyers
- Agents
- Personal Assistants
- Referrals from contacts
- Referrals from brokers
- Intermediary banks

## **What we use your personal information for**

We are allowed to use your personal information provided we have a lawful basis for doing so. Under data protection legislation, we must rely on one or more of the following grounds when processing your data:

- To fulfil a contract we have with you.
- To comply with a legal obligation.
- You have given clear consent for us to process your personal information for a specific purpose.
- Processing your personal information is necessary for our legitimate interests which we are obliged to communicate to you. You have the right to object to this processing, however please bear in mind if you object this may affect our ability to provide certain products and services.

We use your personal information in the ways that you would expect in order to ensure we meet our obligations to you. This will include using your personal information for the following purposes:

- Confirming your identity and carrying out background checks for the purpose of detecting and preventing money laundering and other criminal activities
- Credit assessment and internal risk assessments and checks
- Complying with any requirement of any applicable statute, regulation and/or FCA Rules and PRA Rules
- Providing you with products and services
- Operating your accounts
- Updating your records
- Advising you of other products and services offered by us where you have consented to receive this information
- Insurance, audit and administrative purposes
- Market research
- Carrying out financial reviews
- Informing you about important changes or developments to the features and operation of any products and services we offer to you
- Managing your relationship with us
- Arrears and debt recovery activities

We will not be able to open or maintain an account or service if you fail to provide certain personal information to us.

***Where we provide you with Private Banking services:***

<b>Personal information we may receive</b>	<b>Purpose for using and storing this personal information</b>	<b>Our lawful basis for using your personal information</b>
<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details (i.e. correspondence address, fax number, telephone number and email address)</li> <li>• Date of birth</li> <li>• Gender</li> <li>• Nationality</li> <li>• Financial information, including details of the source of funds</li> <li>• Personal information received as part of identity checks</li> <li>• References</li> <li>• Details of education and employment</li> <li>• Visual images</li> </ul>	<p>Serving you as a customer by:</p> <ul style="list-style-type: none"> <li>• Undertaking mandatory 'Know Your Client' checks</li> <li>• Creating a customer account</li> <li>• Providing account statements</li> <li>• Undertaking payment activities at your request</li> <li>• Managing our relationship with you</li> <li>• To make suggestions and recommendations to you about products or services that may be of interest to you</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for the performance of a contract to which you are a party</li> <li>• In our legitimate interests to develop our products and services and grow our business</li> <li>• Compliance with our legal obligations</li> </ul>

<b>Special category (sensitive) personal information we may receive</b>	<b>Purpose for using and storing this personal information</b>	<b>Our lawful basis for using your personal information</b>
<ul style="list-style-type: none"> <li>Any information revealing your political opinions received as part of identity checks</li> </ul>	<ul style="list-style-type: none"> <li>Undertaking mandatory 'Know Your Client' checks</li> </ul>	<ul style="list-style-type: none"> <li>For the purpose of providing the services you request where you have consented</li> </ul>

***Where we provide you with Structured Property Finance services:***

<b>Personal information we will receive</b>	<b>Purpose for using and storing this personal information</b>	<b>Our lawful basis for using your personal information</b>
<ul style="list-style-type: none"> <li>Name</li> <li>Contact details</li> <li>Date of birth</li> <li>Gender</li> <li>Nationality</li> <li>Financial information</li> <li>Personal information of authorised signatories and representatives of corporate clients</li> <li>Personal information of brokers</li> <li>Personal information received as part of identity checks</li> </ul>	<p>Serving you as a customer by:</p> <ul style="list-style-type: none"> <li>Undertaking mandatory 'Know Your Client' checks</li> <li>Creating a customer account</li> <li>Providing structured property finance services</li> <li>Managing our relationship with you</li> </ul>	<ul style="list-style-type: none"> <li>Necessary for the performance of a contract to which you are a party</li> <li>Compliance with rules and guidance from regulators in respect of the provision of structured property finance services, and other legal obligations</li> </ul>

**Who we share your personal information with**

We will treat your personal information as private and confidential. In some instances we may be required to disclose your personal information to organisations outside of the Jordan International Bank group for the purposes set out above. We may share your personal information with the organisations listed below in order to meet our contractual obligations to you or where necessary to comply with our legal obligations.

**Authorities and Credit Reference Agencies**

Where we share your personal information with authorities, this could include official bodies such as:

- Central and local government
- HM Revenue & Customs, regulators and other tax authorities
- UK Financial Services Compensation Scheme and other deposit guarantee schemes
- The Financial Conduct Authority and The Prudential Regulation Authority
- Jordan Financial Markets
- National Crime Agency
- Law enforcement and fraud prevention agencies
- Credit Reference Agencies including Equifax

We may also share your personal information where required to do so by court order or where we are under a duty to disclose or share your personal information in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation with any person to whom disclosure is necessary to enable us to enforce our rights under this privacy statement or under an agreement with you or to protect our rights or the rights of third parties.

### **Service Providers**

Where we share your personal information with service providers that we use to help us to provide our products and services to you, this could include organisations such as:

- Accountants
- Auditors
- Legal advisors
- Estate agents
- Fund managers
- World Check
- CSC Bank SAL

### **Business Support**

Where we share your personal information with business support providers, this could include organisations such as:

- Information management providers
- Technology and system support providers
- Regulatory reporting and collateral management providers
- Courier companies

### **Merger and Acquisitions**

We may choose to sell, transfer or merge parts of our business or our assets, in which case we 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 statement.

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.

### **Marketing**

Where permitted in our legitimate interests or with your prior consent where required by law, we will use your personal information for marketing purposes and to send you emails about our products and/or services.

You can object to further marketing communications at any time by selecting the "unsubscribe" link at the end of all our marketing emails, or by contacting us using the contact details set out at in the 'Your rights' section of this privacy statement below.

## Transferring your personal information outside the European Economic Area

We may transfer your personal information to one or more countries outside the UK and the European Economic Area ("EEA"), where we (or other companies within the Jordan International Bank group) or our service providers or suppliers maintain operations, including Jordan.

You understand that if your personal information is disclosed to third parties outside the EEA, these 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 European Commission.

In these circumstances, we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisational, contractual or other lawful means. Please contact our Compliance Officer at [compliance@jordanbank.co.uk](mailto:compliance@jordanbank.co.uk) for a copy of the safeguards which we have put in place to protect your personal information and privacy rights in these circumstances.

We may transfer your personal information outside the EEA:

- in response to a request made by you;
- in order to store it;
- in order to enable us to provide products or services to you and fulfil our contract with you with the support of our parent companies located in Jordan;
- to our selected third party service providers or suppliers (listed above);
- where we are legally required to do so; and
- in order to facilitate the operation of the Jordan International Bank group, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

## How long we keep your personal information

We will keep your personal information for as long as you are a customer or have a relationship with us. We will also keep your personal information for a certain period after your application or engagement with us has ended or once your account is closed.

In order to establish the retention period for your personal information, we will need to account for our legal obligations, the expectations of financial and data protection regulators, and the amount of time we may strictly need to hold your personal information to carry on our business or defend our rights.

Where you have a Jordan International Bank account or have entered into an engagement with us, we will maintain your personal information for the duration of time that your account is open with us, or of your engagement with us. In order to meet our legal or regulatory requirements, we must keep much of this information for a number of years after the account is closed or your engagement with us comes to an end, and even if you do not have any other active accounts with us. This may be for the period during which legal claims can be made under applicable law. In England and Wales this is six years for contractual claims and twelve years for claims brought under a deed, however regulatory limitation periods may be longer.

Following your account closure or end of engagement with us, we will only use your personal information for the relevant legal or regulatory purposes and will ensure that your privacy is adequately protected.

We may retain a record of your stated objection to the processing of your personal information, including in respect of an objection to receiving marketing communications, for the sole legitimate purpose of ensuring that we can continue to respect your wishes and not contact you further, during the term of your objection.

## Your rights

Under certain circumstances you have the right to:

- (i) **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.
- (ii) **request rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate personal information we hold about you corrected;
- (iii) **request erasure** of your personal information. This enables you to ask us to delete or remove your personal information where there is no good reason for us continuing to process it;
- (iv) **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;
- (v) **object to further processing** of your personal information; and
- (vi) **request the transfer** of your personal information to a third party in a commonly used electronic format.

## Contact us

If you wish to exercise any of the above rights in relation to the personal information we hold about you or wish to change your preferences at any time, please contact us:

- By email at: [compliance@Jordanbank.co.uk](mailto:compliance@Jordanbank.co.uk).
- By writing to us, for the attention of our Compliance Officer, at: Jordan International Bank Plc, Almack House, King Street, London, England, SW1Y 6QW.

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

If your request or concern is not satisfactorily resolved by us, you may approach the **Information Commissioner's Office**, the UK supervisory authority for data protection issues, to make a complaint about our processing of your personal information, or to request further information about your rights and our obligations in relation to your personal information.

This privacy statement was last updated on 12<sup>th</sup> December 2018