



# UOB Privacy Notice

May 2018

UOB (“the Bank”) is committed to protecting your privacy and ensuring the highest level of security for your personal information. This Privacy Notice explains the types of personal information we collect, how we use that information, who we share it with, and how we protect that information.

Please read the following carefully to understand our views and practices regarding your personal information.

## **1. Who are we?**

For the purposes of applicable data protection laws, the data controller is United Overseas Bank Ltd of 50 Cannon Street, London, EC4N 6JJ, registered number Z6798458.

## **2. What information is covered by this Privacy Notice?**

This Privacy Notice covers all personal information processed by the Bank which means information that (either in isolation or in combination with other information) enables you to be identified directly or indirectly.

## **3. What information do we collect from you?**

We may collect information about you from the following sources:

### **3.1 Information we receive from you**

We may collect personal information (such as your name, postal and email address, previous addresses, telephone and fax number, occupation, assets, income, employment details, nationality, marital status, passport, National Insurance Number and Tax Identification Number or other identification details) that you provide to us when you:

- submit applications to open an account; and
- subsequently correspond with us.

### **3.2 Information we collect about you**

We may collect information about you from third party sources to perform financial crime risk management activity as well as credit checks.

## **4. How do we use your personal information?**

### **4.1 We will process, transfer and disclose your information to:**

- Provide services;
- Deal with any of your transactions;

- Meet Compliance obligations;
- Perform financial crime risk management activity;
- Collect any money you owe us;
- Perform credit checks and obtain or provide credit references;
- Enforce or defend the rights of a member of the UOB Group;
- For internal operational requirements of members of the UOB Group (including, for example, product development, insurance, audit and credit and risk management);
- Manage our relationship with you; and
- Verify your identify.

#### **4.2 Tracking or recording what you say or do**

To help keep you and your money safe, we may record details of your interactions with us. We may record and keep track of conversations with us including phone calls, face-to-face meetings, letters, emails and any other kinds of communication.

We may use these recordings to check your instructions to us, assess, analyse and improve our service, train our people, manage risk or to prevent and detect fraud and other crimes. We may also capture additional information about these interactions (e.g. telephone numbers that we are called from and information about devices or software that are used).

We use closed circuit television (CCTV) in and around our offices and these may collect photos videos or voice recordings of you.

#### **5. Do we use your personal information for direct marketing?**

With your permission, we may send you carefully selected information about our products and services. You have the right to opt out of receiving direct marketing at any time.

#### **6. Purpose of data processing and on what Legal basis?**

We process personal data in accordance with the applicable provisions of the European General Data Protection Regulation (GDPR):

##### **a. For fulfillment of contractual obligations (Art. 6 para. 1b of the GDPR)**

Data is processed in order to provide banking business and financial services in the context of carrying out our contracts with our clients or to carry out pre-contractual measures that occur as part of a request. The purposes of data processing are primarily in compliance with the specific product (e.g. bank account, credit, deposits, client referral) and can include needs assessments, cash management and support, as well as carrying out transactions. You can find other details about the purposes of data processing in the relevant contract documents and terms and conditions.

**b. In the context of balancing interests (Art. 6 para. 1f of the GDPR)**

Where required, we process your data beyond the actual fulfillment of the contract for the purposes of the legitimate interests pursued by us or a third party. Examples: – Consulting and exchanging data with information offices (e.g. debt register) to investigate creditworthiness and credit risks in credit business and the requirement for an account maintained with a minimum balance – Reviewing and optimizing procedures for needs assessment for the purpose of direct client discussions – Marketing unless you have objected to the use of your data – Asserting legal claims and defense in legal disputes – Guarantee of a bank’s IT security and IT operation – Prevention and clarification of crimes – Video surveillance to protect the right of owner of premises to keep out trespassers, for collecting evidence in hold-ups or fraud – Measures for building and site security (e.g. access controls) – Measures for ensuring the right of owner of premises to keep out trespassers – Measures for business management and further development of services and products – Risk control in the Bank. In addition we obtain personal data from publicly available sources for client acquisition purposes.

**c. As a result of your consent (Art. 6 para. 1a of the GDPR)**

As long as you have granted us consent to process your personal data for certain purposes - this processing is legal on the basis of your consent. Consent given can be withdrawn at any time. This also applies to withdrawing declarations of consent that were given to us before the GDPR came into force, i.e. before May 25, 2018. Withdrawal of consent does not affect the legality of data processed prior to withdrawal.

**d. Compliance with laws and regulatory compliance obligations**

We’ll use your information and information relating to individuals connected to your business to meet our compliance obligations, to comply with laws and regulations that the Bank is subject to and to share with our regulators and other regulators and authorities. This may include using information to help detect or prevent crime (including terrorism financing, money laundering and other financial crimes).

**7. With which third parties do we share your personal information?**

Your personal information are intended for the Bank but may be shared with third parties in certain circumstances:

**UOB's group of companies:** We may share your personal information among our group of companies, including head office, its subsidiaries and branches, in order to open your account with us, administer our services and products, provide you with customer support, process your payments, understand your preferences, send you information about products and services that may be of interest to you and conduct the other activities described in this Privacy Notice.

**Other Service Providers:** We may share personal information with the following categories of service provider:

- infrastructure and IT service providers, including for email archiving.
- marketing, advertising and communications agencies.

- credit reference agencies.
- external auditors and advisers.
- any Authorities.
- persons acting on your behalf, payment recipients, beneficiaries, account nominees, intermediary, correspondent and agent banks, clearing houses and clearing and settlement systems.
- other financial institutions, fraud prevention agencies, trade associations, credit reference agencies and debt recovery agents
- any introducing broker we provide instructions or referrals to or from whom we receive them
- any third party we use to provide services to you.

In the course of providing such services, these service providers may have access to your personal information. However, we will only provide our service providers with personal information which is necessary for them to perform their services, and we require them not to use your information for any other purpose. We will use our best efforts to ensure that all our service providers keep your personal information secure.

**Third parties permitted by law:** In certain circumstances, we may be required to disclose or share your personal information in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, regulators, government agencies or to judicial or administrative authorities).

We may also disclose your personal information to third parties where disclosure is both legally permissible and necessary to protect or defend our rights, matters of national security, law enforcement, to enforce our contracts or protect your rights or those of the public.

**Third parties connected with business transfers:** We may transfer your personal information to third parties in connection with a reorganisation, restructuring, merger, acquisition or transfer of assets, provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Notice.

We will not sell your personal information to third parties.

## 8. Do we transfer personal information outside the EEA?

Your personal information may be transferred to and processed in all countries where UOB Group has established a legal presence by our affiliates and our service providers. We will take all steps that are reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice as well as applicable data protection laws, including, where relevant, by entering into EU standard contractual clauses (or equivalent measures) with the party outside the EEA (available here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)).

## 9. What are your rights (EEA residents only)?

If you are a resident in the European Economic Area, you have the following rights (if applicable):

- **Access.** You have the right to request a copy of the personal information we are processing about you. For your own privacy and security, at our discretion we may require you to prove your identity before providing the requested information.
- **Rectification.** You have the right to have incomplete or inaccurate personal information that we process about you rectified.
- **Deletion.** You have the right to request that we delete personal information that we process about you, except we are not obliged to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- **Restriction.** You have the right to restrict our processing of your personal information where you believe such data to be inaccurate; our processing is unlawful; or that we no longer need to process such data for a particular purpose unless we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.
- **Portability.** You have the right to obtain personal information we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) personal information which you have provided to us, and (b) if we are processing that data on the basis of your consent or to perform a contract with you.
- **Objection.** Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.
- **Withdrawing Consent.** If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge. This includes cases where you wish to opt out from marketing messages that you receive from us.

You can make a request to exercise any of these rights in relation to your personal information by sending the request by mail to UOB London Branch of 50 Cannon Street, London, EC4N 6JJ or email to [uob.london@uobgroup.com](mailto:uob.london@uobgroup.com).

You also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. If you are based in, or the issue relates to, the UK, the Information Commissioner's Office can be contacted as follows:

Telephone: +44 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Website: [www.ico.org.uk](http://www.ico.org.uk)

Web-form: [www.ico.org.uk/concerns/](http://www.ico.org.uk/concerns/)

Address: Water Lane, Wycliffe House, Wilmslow, Cheshire, SK9 5AF

## **10. How do we protect your personal information?**

We have implemented technical and organisational security measures to safeguard the personal information in our custody and control. Such measures include, for example, *limiting access to personal information only to employees and authorised service providers who need to know such information for the purposes described in this Privacy Notice* as well as other administrative, technical and physical safeguards.

While we endeavour to protect our systems, sites, operations and information against unauthorised access, use, modification and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers.

## **11. How long do we keep your personal information?**

We will retain your personal data in line with our data retention policy. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes such as managing your account and dealing with any disputes or concerns that may arise.

We may need to retain information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes (e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators etc).

When we no longer need to use personal information, we will remove it from our systems and records and/or take steps to anonymise it so that you can no longer be identified from it.

## **12. How do we deal with children's privacy**

We will never knowingly collect personal information from individuals under the age of thirteen (13) years without first obtaining verifiable parental consent. If you are under the age of 13 you should not provide information to us. If we become aware that a person under 13 has provided personal information to us without verifiable parental consent, we will remove such personal information from our files.

## **13. How can you contact us?**

If there are any questions or concerns regarding this Privacy Notice, please contact us as follows:

- by email: [uob.london@uobgroup.com](mailto:uob.london@uobgroup.com)
- by post: United Overseas Bank Ltd, London Branch, 50 Cannon Street, London, EC4N 6JJ

We reserve the right to change our Privacy Notice from time to time. If we decide to change our Privacy Notice we will notify you of these changes.