

1 INTRODUCTION

FirstBank UK Limited (FirstBank UK) is committed to safeguarding the privacy of personal and sensitive personal data and is bound to comply with the UK Data Protection Act 1998 and EU General Data Protection Regulation (GDPR), along with similar and applicable laws in other countries around the world. This Privacy Notice forms part of FirstBank UK's obligation to be open and fair with all individuals whose personal and sensitive personal data FirstBank UK processes and to provide details around how it processes such personal data and what it does with it.

FirstBank UK processes the personal data of its customers such as names, contact details and email addresses, amongst other things. Processing of this data implies collecting, storing, using, disclosing or disposing of individuals' personal data.

Existing or prospective customers who use FirstBank UK's product and services, or use the FirstSave website, may be provided with further privacy notices which may be contained in a separate supplemental notice. These additional privacy notices shall supplement this Privacy Notice.

This Privacy Notice relates to the processing of personal data by FirstBank UK. Unless otherwise stated, all references to "we" or "our" shall imply all FirstBank UK Limited lines of business that process personal or sensitive personal data.

None of the lists, or examples provided in this Privacy Notice, are intended to be exhaustive or fully representative of every individual.

2 SCOPE

The scope of this Privacy Notice covers customers (existing and prospective) personal data in respect of the following: -

- Collecting Personal Data
- Using Personal Data
- Disclosing Personal Data
- Retaining Personal Data
- Securing Personal Data
- International Data Transfers
- Subject Access Requests
- Updates / Amendments
- Third Party Websites

- The FirstSave Website – Use of Cookies
- Opt-in / Opt-out
- Our Details
- Complaints

3 COLLECTING PERSONAL DATA

We may collect and store the following kinds of personal data: -

- a) Information about your computer and about your visits to the FirstSave website, including your IP address, geographical location, browser type and version.
- b) Information that you provide to us for the purpose of subscribing to our marketing communications.
- c) Information that you provide to us when using any of our products and services, or that is generated during the course of using those solutions and services.
- d) Information that you post on our social media platforms.
- e) Information contained in, or relating to, any communication that you send to us through our website, email or in writing.
- f) Information that you provide as part of performing money laundering, financial and credit checks as well as for fraud and crime prevention and detection purposes.
- g) Information related to the security and access of our premises, systems and applications.
- h) Information to help us comply with our legal and regulatory obligations, including reporting to and being audited by regulators and external auditors.
- i) Information to help us comply with court orders and to exercise and defend our legal rights.
- j) Any other personal information that may be sent to us and which we use for legitimate business purposes.

Before you disclose to us the personal data of another person, you must obtain that person's consent to both the disclosure and the processing of that personal data in accordance with this Privacy Notice.

4 USING PERSONAL DATA

Reasons for processing personal data may fall into a number of categories. These categories are defined within the GDPR. FirstBank UK will process your personal data for the following purposes.

Contract – to enable the fulfilment of the contract we have with you. Including;

- Supply you with our products and services.
- Enable your use of any product or service that we may provide through our website.
- Send payment reminders to you or collect payments from you.
- Administer, personalise and secure our website.
- Deal with enquiries and complaints.

Legal – to enable us to comply with our legal and regulatory obligations. Including;

- Perform money laundering, financial and credit checks.
- Ensure appropriate access to systems and data.
- Responding to regulator or law enforcement agencies requests for information.

Consent – to enable us to process your data for specific purposes where we need to ask your permission first, Including;

- Sending you marketing communications.

5 DISCLOSING PERSONAL DATA

We only disclose your personal data in the ways set out in this Privacy Notice or subject to any agreements in place between us. The following circumstances may apply:

- a) Across our different lines of business, as part of a need to know or as part of improving our existing products and services or as part of providing new solutions and services.
- b) To third parties who process personal data on our behalf, such as systems providers.
- c) To third parties who process personal data on their own behalf but provide us, or you, with a service on behalf of us.
- d) To third parties with whom information is shared for money laundering checks, credit risk reduction and other fraud and crime prevention purposes.
- e) To any prospective buyer in the event we sell any part of our business, or its assets, or if substantially all of our assets are acquired by a third party.
- f) To any regulator, external auditor or applicable body or court where we are required to do so by law or regulation or as part of any investigation.
- g) To any central or local government department and other statutory or public bodies, such as the HMRC.

We do not sell, rent or trade any of your personal data.

We will not, without your consent, disclose or supply your personal data to any third party for the purpose of their or any other third party's direct marketing.

6 RETAINING PERSONAL DATA

Personal data that we process, for any purpose or purposes, shall not be kept for longer than necessary.

Unless there are any additional legal or regulatory obligations that we have to meet FirstBank UK will not retain your data for longer than 7 years after the end of our relationship with you.

You have the right to request we erase your data, where we do not have any overriding obligations for its continued retention.

7 SECURING PERSONAL DATA

Where FirstBank UK acts as the controller of personal data, it will ensure that necessary and adequate safeguards are in place to prevent unauthorised access, loss, misuse or alteration of your personal data.

We store all personal information on secure servers with relevant access and firewall controls.

Any personal data sent to us, either in writing or email, may be insecure in transit and we cannot guarantee its delivery.

Passwords must be kept confidential and not disclosed to a third party. FirstBank UK does not ask you for your passwords.

8 INTERNATIONAL DATA TRANSFERS

Personal data that we collect is stored in the UK and not outside the European Economic Area.

Should we need to transfer personal data outside of the UK or European Economic Area in the future, such personal data will be covered by binding corporate rules or contractual arrangements to ensure it is processed appropriately.

When data is processed (or will be processed) outside of the UK or European Economic Area, we will notify you.

9 SUBJECT ACCESS REQUESTS

You may instruct us to provide you with details of any personal data we hold about you as part of a Subject Access Request. The provision of such information will be subject to: -

- a) The payment of a £10 fee up to the 24th of May 2018 and no fee from the 25th May 2018 and onwards; and
- b) Appropriate evidence of your identity, such as a passport, driving licence as well as a recent credit card statement or utility bill.

In certain instances we may be legally required withhold some personal data that you request.

You have the right to rectification and may wish to contact us if the personal data that we hold about you needs to be corrected or updated.

You have the right to object to us processing your data, and the right to request we restrict the processing of your data.

We do not perform any automated profiling of individuals.

10 UPDATES / AMENDMENTS

In order to remain compliant with any legal and regulatory obligations, or as part of our evolving business practices, we may update this Privacy Notice from time to time by publishing a new version. In certain instances, we may notify you.

11 THIRD PARTY WEBSITES

We are not responsible for the practices employed by Third Party Websites linked to or from our Website nor the information or content contained therein. Often links to other websites are provided solely as reference points to information on topics that may be useful to the users of our Website. Please remember that when you use a link to go from our website to a Third-Party Website, our Privacy Notice will no longer apply. Your browsing and interaction on any other Website, including Third Party Websites, which have a link on our Website, are subject to that Website's own Privacy Notice.

12 THE FIRSTSAVE WEBSITE – USE OF COOKIES

FirstBank UK records the number of visitors to the relevant sections of our Website and tracks movement between the sections by means of 'cookies'. Cookies are small data/text files containing anonymous information placed on your computer and are automatically downloaded to a user's hard drive in order to recognise a user that has visited our Website previously. FirstBank UK reserves the right to use cookies in order to analyse trends and to improve

the design and layout of its Website. You cannot be identified as an individual from this type of information.

13 OPT IN/OPT OUT

You have the right, at any time, to ask us not to process your personal data for marketing purposes. We will not process your data for marketing purposes without asking your permission first.

You can opt-out of receiving email communications simply by clicking the unsubscribe link, which is contained within marketing emails. Or alternatively by emailing, calling or writing to us (our contact information is in Section 14, below).

You may instruct us at any time not to process your personal data for marketing and communications purposes by means of 'opting-out'.

Please note it can take up to 30 days for a request to be fulfilled because of pre-planned or ongoing marketing activity.

14 DATA PROTECTION REGISTRATION

We are registered as a data controller with the UK Information Commissioner's Office and our data protection registration number is **Z7356157**.

15 OUR DETAILS

FirstBank UK Limited is registered in England and Wales under company number **04459383**.

Its trading office is at 28 Finsbury Circus, London, EC2M 7DT, United Kingdom.

You can contact us as follows: -

Email: dpo@fbnbank.co.uk

Web: <http://www.fbnbank.co.uk>

Telephone: +44 (0)207 920 4920

In Writing: Data Protection Officer
FirstBank UK Limited
28 Finsbury Circus
London
EC2M 7DT
United Kingdom

16 COMPLAINTS

If you feel your rights have not been respected, or do not feel a situation was resolved satisfactorily, you have the right to raise a complaint with the UK Information Commissioner.

You can contact them as follows: -

Web:	https://ico.org.uk/concerns/
Telephone:	+44 (0)303 123 1113
In Writing:	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF