

FirstSave UK - Privacy Notice

This web site is administered by FirstBank UK Limited ('FirstBank UK') who provide FirstSave products.

Data controller: FirstBank UK Limited ("FirstBank UK", "we", "us", "our"). This privacy notice explains the processing activities involving your personal data carried out by FirstBank UK as data controller, when you use our products and services and/or websites.

Our registered office is at 28 Finsbury Circus, London, EC2M 7DT. Our UK registered company number is 04459383.

We are a member of the FirstBank group. This includes FirstBank Holdings Plc (our ultimate holding company) and any entities wholly or partially owned by it (the "Group"). More information about the Group can be found at <https://www.fbnholdings.com>.

FirstBank UK collects data when you visit our website, when you enrol for our services, when you use our online or offline products/services, or when you otherwise contact us, that identifies, or is associated with, you (either by itself or when combined with other information). Such information shall be referred to as "personal information" or "personal data". We may use this personal information along with other information collected or generated during our relationship with you for the reasons explained in this notice.

It is important that you read this privacy notice carefully to ensure you are fully aware of how and why we are using your data.

If you have any questions about this privacy notice, our approach to data protection generally or you wish to exercise your legal rights please contact our Data Protection Officer (DPO) using the details set out in "Your rights" section below.

FirstBank UK is committed to protecting and respecting your privacy by being transparent about how it collects and uses your personal data and to meeting its data protection obligations. The purpose of this notice is to clarify:

1. What information does FirstBank UK collect?
2. How we collect personal data?
3. Why does FirstBank UK process personal data?
4. How do we process your data using AI?
5. How and why do we share your personal data?
6. Transferring personal data overseas
7. How does FirstBank UK protect personal data?
8. For how long does FirstBank UK keep personal data?
9. Your rights
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1. What information does FirstBank UK collect?

We may collect, use, store and/or transfer different kinds of personal information. We will limit the collection and processing of personal information to what is necessary for the purposes identified in this notice. The types of personal information we collect may include:

1. Basic personal data to identify you, such as your first name, maiden name, last name, marital status, title, date of birth;
2. Your contact information including your email address, address and telephone numbers;
3. Financial information including bank account details, card payment details and transactional information and history;
4. Information regarding the products and services provided to you by the Group;
5. Technical data including online activity based on your interaction with us, our websites and applications - for example your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types, searches, site visits and versions, operating system and platform, and other technology on the devices you use to access this website;
6. Personal images such as copies of your passport or driver's licence or CCTV images;
7. Profile data which may include your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;
8. Usage data including statistical data including information about how you use our website, products and services; and
9. Marketing and Communications Data including your marketing preferences from us and our third parties and your communication preferences.

It is important that the information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

2. How we collect personal data?

FirstBank UK collects this data from various sources. For example:

1. through application forms, CVs or biographies;
2. obtained from your passport or other identity documents;
3. from forms completed by you;
4. from correspondence with you;
5. through calls, meetings or other types of exchange;
6. while providing customer support, consultation, live chat, or other interaction;
7. through the process of maintaining and upgrading our services; through means such as communications protocols and e-mail communications;
8. through our mobile applications;
9. when information is provided to us from third parties authorized under applicable law to initiate transactions or perform account-related services on your behalf, such as account information service providers or payment initiation service providers.

3. Why does FirstBank UK process personal data?

FirstBank UK may need to use the personal information you provide and that we collect from other people for the following legal bases and legitimate business purposes:

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Providing our services to you

FirstBank UK may need to use relevant personal information to perform its contractual obligations with you or provide our services to you. For example, to conduct a payment or money transfer, or to enter into a foreign exchange derivative contract with us and thus enable you to become a client, you must provide certain information required by us to execute the transaction and to enable us to comply with our legal obligations associated with providing such services. Failure to provide some of your personal information may affect our ability to provide the requested services to you. We will inform you when personal information is required in order to use our services.

Legal and compliance purposes

This includes using your personal information to comply with legal and regulatory requirements, such as: anti-money laundering and counter-terrorist financing; detection, prevention and prosecution of fraud and theft; as well as preventing illegitimate or prohibited use of our services. This may also include establishing, exercising, or defending legal rights and claims, monitoring and reporting compliance issues, or responding to legal due process. Additionally, this includes using your details to validate and authenticate your identity and using relevant third parties to help us do this, as well as retaining records containing your personal information as required under applicable law.

Legitimate business purposes

We use your personal information to analyse and improve our products, services, operations, the running of our websites and your customer experience. We also use your personal information to:

- provide appropriate customer services;
- to conduct other administrative tasks necessary to provide our services;
- to help manage risks related to security, fraud and identity, and
- to protect the security and integrity of our technology, systems, and services.

We conduct analysis of the information we hold to better understand our customers and may process it using Artificial Intelligence (“AI”) tools. If so, AI tools will be used for internal purposes only and will not impact your rights.

We may also conduct credit checks on you and your business using a licensed credit reference agency.

4. How do we process your data using AI?

FirstBank UK and its partners may use AI tools to transcribe customer calls and use related AI services to **summarise** conversations, capture key points, and identify areas on which to follow-up.

We do this in order to:

- Improve customer support quality and consistency
- Reduce handling time and after-call work
- Maintain accurate records of requests, complaints, and outcomes
- Train and support our staff (by way of nonbiometric and non-behavioural analytics).

These summaries support our staff and are **not** used to make automated decisions that will have a binding legal or similarly significant effect without human involvement. Our staff review and use the summary to progress your request. We keep summaries only as long as

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needed for these purposes and we apply the following to such summaries: (i) access controls, (ii) an agreed schedule, and (iii) encryption controls.

5. How and why do we share your personal data?

FirstBank UK may from time to time share your personal data with the following bodies who are also required to keep your information confidential, safe and secure:

1. Our parent company and any member of the Group;
2. Third parties, commercial partners (which may include without limitation credit reference agencies), agents, professional advisors and subcontractors who provide products, services and administrative support to the Group, or who may be engaged on your behalf;
3. Where we are required by law and/or law enforcement agencies: banking regulators, judicial bodies, statutory auditors, credit reference agencies, fraud prevention agencies, governmental entities, tax authorities or regulatory bodies around the world;
4. Prospective transferees where required as part of any proposed sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or business assets; or
5. Anyone else with your express permission.

6. Transferring personal data overseas

From time to time we may share your personal data with organisations in other countries including organisations within the Group.

Additionally, when you send or receive money to or from another country, we may send some of your personal information to such country as required and permitted by law. The privacy law in countries to which personal information is transferred may not provide the same level of data protection as is in force within the EEA. If this is the case, personal information transferred outside the EEA will be protected by EU-approved mechanisms for transferring data internationally, including appropriate contractual clauses, as required by law.

7. How does FirstBank UK protect data?

FirstBank UK takes the security of your data seriously. FirstBank UK has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees (or other permitted recipients as set out in this notice) in the performance of their duties.

Where FirstBank UK engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

8. For how long does FirstBank UK keep data?

We will not retain your personal data longer than is necessary. The retention periods for which FirstBank UK will hold your personal data will vary depending on its category including but not limited to the nature and type of record, the nature of the activity, the product or service and any applicable legal or regulatory requirements. Your personal information will be retained in accordance with defined statutory periods applicable to providing financial services, including

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those in anti-money laundering, anti-terrorist financing and other laws applicable to FirstBank UK. For the most part, your personal data will be retained for no longer than seven years after the end of our relationship, unless compelled to do so pursuant to a legal requirement or in accordance with our regulatory obligations.

9. Your rights

You have the right to know if we are processing your personal information, and to ask us for a copy of your information free of charge. You have the right to request a structured and machine-readable copy of the information you have provided to us. We may charge you a reasonable fee for providing the information, or not act upon your request, if the request is manifestly unfounded or excessive. You have the right to request us to stop sending you marketing communications. You have the right to ask us to correct information about you that is incomplete, inaccurate or out-of-date. You have the right to ask us to erase certain information about you, to restrict certain uses of your information, and also to object to certain uses of it. You also have the right to lodge a complaint with a supervisory authority about our processing of personal information. When we receive a request, we may ask for additional information from you to verify your identity.

To exercise these rights, please contact our data protection officer (DPO) at FirstBank UK through the following channels:

Data Protection Officer

Freepost RUGA-GZSJ-LEJJ
FirstSave
PO Box 966, 1 Cobalt Park Way
Wallsend
NE28 5FB

Email: customerservice@firstsave.co.uk

Telephone: 0345 601 2211

This telephone line is available between the hours of 9am to 5pm Monday to Friday (excluding Bank Holidays).

10. Links to other websites

Within our website we may have links to third party websites, plug-ins and applications. Clicking those links may enable third parties to share or collect your personal data. FirstBank UK do not control such third-party websites and is not responsible for their privacy statements or the contents of those websites. We would encourage you to read the privacy statements of every website you visit.

11. Changes to the privacy notice

We keep our privacy notice under regular review. Any changes to our privacy notice in the future will be posted on this page. We encourage you to review this page regularly to identify any updates or changes to our privacy notice.

February 2026