



Data Privacy Notice - DPN

Personal Banking For Dedicated Shareholders, Investors and Investing Corporations

Before we start

This privacy notice applies to personal information held by **Universal Banks – UB**, herein referred to as the bank and its banking partners and associates. It describes the information we will collect about you and how we intend on using such information. It further explains who we will share your information with and when and also, what we intend on doing to ensure it stays safe and secure. It continues to apply even if your agreement for investment banking or other products and services with us ends. It should also be read alongside your investment banking terms and conditions.

This notice covers any personal products and services you may have with us. This includes your savings, investments on any portfolio, loans and credits as well as insurance.

Wherever we have used 'you' or 'your', this implies you or any authorized person on your account, anyone who does your banking or any related entries with us for you - for example, trustees, executors or attorneys and any other related persons or authorized entities which may include signatories, partners, members or trustees. When we use 'we', we mean **Universal Banks – UB** which acts as a data controller in respect to your provided personal information unless otherwise stated below, the data controller for the purposes of this notice is the bank, **Universal Banks – UB**.

The address for the bank, **Universal Banks – UB** is **Paphos Banking Center, 20 Griva Digeni Ave., CY - 8061 Paphos, Cyprus**. If the need to get in touch arises, please visit our website – universalbanks.com and view our other contact information and use as it suits you most.

The information we collect

We will only collect information about you as allowed by regulations and law. We may collect it from a range of places and it may relate to any of our products or services you apply for, currently hold or have held in the past. We may also collect information about you when you interact with us. This includes when you visit our websites or mobile channels, call us or visit one of our branches, or ask about any of our products and services. Some of it will come directly from you, for example, when you provide ID to open an account.

It can also come from your financial advisor, broker or mortgage intermediary, the insurance company which provides the insurance policies we offer, or other places you have asked us to get information from. We might also get some from publicly available places. The information we collect will depend on the type of product you hold. It may include:

The information you provide to us, for example:

- personal details, for example, names, gender, date and place of birth;
- contact details, for example, address, email address, and telephone numbers;
- information about your identity for example, photo ID, passport information, National Insurance number, National ID card and nationality;
- market research, for example, information and opinions given;
- user login and subscription data, for example, login details for phone, online banking and mobile banking apps;
- other information about you that you give us when you fill forms in or by communicating with us, whether face-to-face, by phone, email, online, or otherwise;
- if our relationship is because of an insurance policy or claim, we may also collect:
 - information regarding your family or other people who might be covered by or benefit from your insurance policy, or be financially dependent on you;
 - relevant details including details of previous policies and claims history;
 - lifestyle information, for example, if you smoke and how much alcohol you drink;
 - relevant details about your physical or mental health for example, if you make a claim we may ask for medical information;
 - details about any criminal convictions or related information. This includes details of offences or alleged offences;

- any other information which is relevant to a claim that you make.

The information we collect and provide about you, for example:

- your financial information and information about your relationship with us, including the products and services you hold, the channels you use, how you deal with us, your ability to get and manage credit, your payment history, transactions records, market trades, and information about complaints and disputes;
- information we use to identify you, for example, your signature and other information, such as your voice for voice for voice ID, or additional information that we receive from external sources that we need for compliance purposes;
- information included in customer documentation, for example, a record of advice that we may have given you;
- marketing and sales information, for example, details of the services you receive and your preferences;
- information about your device or the software you use, for example, its IP address, technical specification and uniquely identifying data;
- cookies and similar technologies we use to recognize you, remember your preferences and tailor the content we provide to you;
- risk rating information, for example, credit risk rating, transactional behavior and underwriting information;
- investigations data, for example, due diligence checks, sanctions and anti-money laundering checks, external intelligence reports, content and metadata related to relevant exchanges of information between and among individuals or organizations, including emails, voicemail, live chat, etc.;
- records of correspondence and other communications between us;
- information we need to support our regulatory obligations;
- detection of any suspicious and unusual activity and information about parties connected to you or these activities.

The information we collect from other places, for example:

- information you have asked us to collect for you, for example, details about your accounts with us or other companies including transaction data;

- information from third party providers, that helps us to help prevent or detect fraud or that relates to your social interactions. This includes your communications via social media, between individuals, organizations, prospects and other stakeholders acquired from companies that collect combined information;

How we will use your information

We will only use your information if we have your permission or we have another legal reason for using it. These reasons include:

- if we need to pursue our legitimate interests;
- to enter into or carry out an agreement we have with you;
- where we are required to by law;
- where we believe it is in the public interest for us to do so for example, to help prevent or detect crime;
- to establish, utilize or defend our legal rights;
- for insurance purposes.

The reasons we use your information include to:

- provide you with our products and services;
- carry out your wishes, for example, make a payment you request or a change to your insurance policy;
- carry out credit checks;
- manage our relationship with you;
- prevent or detect crime including fraud and financial crime;
- manage risk, ensure security and business continuity;
- provide online services such as online banking and mobile apps;
- market our products and services to you and others;
- improve our products and services, from seeing how you use them;
- protect our legal rights and comply with our legal obligations;
- correspond with solicitors, surveyors, valuers, other lenders, conveyancers and third-party intermediaries;
- carry out system or product development and planning, insurance, audit and administrative purposes;
- recover money that you owe us for example, where you have not paid for your insurance policy.

How we make decisions about you

We may use automated systems to help us make some of our decisions, for example, when you apply for products and services, to make credit decisions and to carry out fraud and money laundering checks. We may also use technology to help us identify the level of risk involved in customer or account activity, for example, for credit, fraud or financial crime reasons, or to identify if someone else is using your account without your permission.

You may have a right to certain information about how we make these decisions and ask for a decision to be made by a person instead of a computer.

Tracking or recording what you say or do

To help keep you and your money safe, we may store details of your interactions with us. We may also record and keep track of conversations you have with us including phone calls, physical meetings, letters, emails, live chats, video chats and any other kinds of communication. We may use these to check your instructions to us, assess, analyze and improve our service, train our people, manage risk or to prevent and detect fraud and other crimes. We may also store additional information about these interactions, for example, telephone numbers that you call us from and information about the devices or software that you use.

We use closed circuit television in and around our offices and branches and these may collect photos or videos of you, or record your voice. Our websites, apps, and other digital products may also track and record your interactions with them to help keep you safe, to help us provide or improve services and features, to help keep our services secure, to help make your visit more personal, or to support our marketing. Some tracking is optional.

Compliance with laws and regulatory compliance obligations

We will use your information to meet our compliance obligations. We will also use it to comply with other laws and regulations. We will share your information with regulators and other authorities that **Universal Banks – UB** are subject to. This may include using it to help detect or prevent crime, including terrorism financing, money laundering and other financial crimes. We will only do this if it is needed to comply with a legal requirement, it is in our legitimate interests and that of others, or to prevent or detect unlawful acts.

Marketing

We may use your information to provide you with details about our products and services, and also products and services from other third parties. We may send you marketing messages by post, email, telephone, text, secure messages, mobile app, or through social media. You can change your mind on how you receive marketing messages or you can stop receiving them at any time. To make that change, please contact us in the usual way.

Even if you tell us not to send you marketing messages, we will continue to use your contact details to send you important information, such as changes to your terms and conditions or if we need to tell you something to comply with our regulatory obligations.

Market research

We may use your information for market research and to identify trends. Market research agencies acting on our behalf may get in touch with you to invite you to take part in research. We would not invite you to take part in research using a communication method if you have asked us not to get in touch that way.

Any responses you provide will be reported back to us anonymously unless you give us permission for your details to be shared.

Who we might share your information with

We may share your information with others where lawful to do so including where we or they:

- need to in order to provide you with products or services you have asked for;
- need to in order to provide you with your insurance policy or to administer your claim;
- have a public or legal duty to do so, for example, to help with detecting and preventing fraud, tax evasion and financial crime;
- need to for any regulatory reporting, litigation or asserting or defending legal rights and interests;
- wish to send marketing to you or others, where you have given us your permission, or it is within our legitimate interest to do so;
- have a legitimate business reason for doing so, for example, to manage risk, confirm your identity, enable another company to provide you with services you have asked for, or check your suitability for products and services;
- have asked you for your permission to share it, and you have agreed.

We may share your information for these purposes with others including

- any joint account holders, trustees, beneficiaries or executors;
- people who give guarantees or other security for any amounts you owe us;
- people you make payments to and receive payments from;
- your beneficiaries, intermediaries, correspondent and agent banks, clearing houses, clearing or settlement systems, market counterparties and any companies you hold securities in through us, for example, stocks, bonds or options;

- other financial institutions, lenders and holders of security over any property you charge to us, tax authorities, trade associations, credit reference agencies, payment service providers and debt recovery agents;
- any fund managers who provide asset management services to you and any brokers who introduce you to us or deal with us for you;
- any people or companies that have an interest in the products or services that we provide to you, including if they take on the risk related to them;
- any people or companies in connection with potential or actual corporate restructuring, merger, acquisition or takeover, including any transfer or potential transfer of any of our rights or duties under our agreement with you;
- law enforcement, government, courts, dispute resolution bodies, our regulators, auditors and any party appointed or asked for by our regulators to carry out investigations or audits of our activities;
- other parties involved in any disputes, including disputed transactions;
- fraud prevention agencies who will also use it to detect and prevent fraud and other financial crime and to confirm your identity;
- anyone who provides instructions or operates any of your accounts on your behalf, for example, Power of Attorney, solicitors, intermediaries, etcetera;
- anybody else that we have been asked to share your information with by either you, a joint account holder or anybody else who provides instructions or operates any of your accounts on your behalf;
- our card processing supplier or suppliers to carry out credit, fraud and risk checks, process your payments, issue and manage your card;
- If our relationship is because of an insurance policy or claim, we will also share your information with:
 - other parties involved in providing your insurance policy, for example, the intermediary or insurer who provides your policy;
 - third parties involved in the administration of the relevant insurance policy or claim including loss adjusters, claims handlers, private investigators, experts and our advisors;
 - where relevant, medical experts and rehabilitation providers.

Online advertisement

When we advertise our products and services on the internet, we may share your information with our advertising partners. For example, when we use social media for marketing purposes, your information may be shared with the social media platforms so that they can check if you hold an account with them.

If you do, we may ask the social media partner or social media network:

- to use your information to send our adverts to you, for example, because we think that you might be interested in a new service that we offer;
- to exclude you from receiving our adverts, for example, because the advert is for a service that you already use;
- to advertise to people who have a similar profile to you, for example, if we discover that one of our services is particularly useful to people with similar interests to the ones on your social media profile, we may ask our advertising partner or the social media network to send our adverts for that service to people who share your interests.

Social media platforms also allow you to indicate your preferences to them about the advertising you receive on their platforms.

Sharing aggregated or anonymized information

We may share aggregated or anonymized information within and outside of the **Universal Banks – UB** with partners such as research groups, universities or advertisers.

You would not be able to be identified from this information, for example, we may share information about general spending trends in the international markets to help in research.

How long we will keep your information

We keep your information in line with our data retention policy. For example, we will normally keep your main banking information for a period of five years from when our relationship with you ends. This allows 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 keep your information for longer where we need the information to comply with regulatory or legal requirements, help detect or prevent fraud and financial crime, answer requests from regulators, etcetera.

If we do not need to keep information for this length of time, we may destroy, delete or anonymize it sooner.

Transferring your information overseas

Your information may be transferred to and stored in locations outside the United Kingdom and the European Economic Area or the EEA, including countries that may not have the same level of protection for personal information. When we do this, we will ensure it has an appropriate level of protection and that the transfer is in line with applicable legal requirements. We may need to transfer your information in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and for our legitimate interests.

In some countries the law might mean we have to share certain information, for example, with tax authorities. Even in these cases, we will only share your information with people who have the right to see it.

Your rights

You have a number of rights in relation to the information that we hold about you. These rights include:

- the right to see information we hold about you and to get information about what we do with it;
- in some circumstances, the right to withdraw your permission to our processing of your information, that you can do at any time. We may continue to process your information if we have another legitimate reason for doing so;
- in some circumstances, the right to receive certain information you have provided to us in an electronic format and ask that we send it to a third party;
- the right to ask that we correct your information if it is inaccurate or incomplete;
- in some circumstances, the right to ask that we delete your information. We may continue to keep your information if we are entitled or required to keep it;
- the right to object to, and to ask that we limit our processing of your information in some circumstances. Again, there may be situations where you object to, or ask us to limit our processing of your information but we are entitled to continue and to refuse that request.

Credit reference checks, fraud and money laundering

Credit reference checks

If you apply for new products or use our services, we may carry out credit and identity checks on you with one or more credit reference agencies or CRAs. To do this, we will give your personal information to CRAs and they will give us details about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply us with both public, including the electoral register and shared credit information, financial situation, history and fraud prevention information. We may use this information to:

- decide if we can offer you credit and whether you can afford the product you applied for;

- confirm the accuracy of the data you have given us;
- prevent criminal activity, fraud and money laundering;
- manage your account or accounts;
- recover debts and ensure any offers provided to you are appropriate to your circumstances

We will continue to exchange information about you with CRAs while you have a relationship with us, including details of your repayment history. If you borrow and do not make payment as per your agreement, CRAs will record the outstanding debt. This information may be supplied to other organizations by CRAs. When CRAs receive a search request from us they will place a search footprint on your credit file. This may be seen by other lenders. If you apply for a bank account or other credit, we will get details of your credit history from a CRA and share information about you with them and use this information to work out how much you can afford.

We may use your information to confirm the accuracy of any details you give us, prevent criminal activity, fraud and money laundering, manage your account or accounts, trace and recover debts and ensure any offers provided to you are appropriate to your circumstances. If you are making a joint application, or tell us that you have a spouse or financial associate, we will link your records together. You should discuss this with them, and share this information with them before submitting the application. CRAs will also link your records together and these links will remain on your and their files until you or your partner successfully files for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail on their websites.

To comply with the law and for our own legitimate interest to allow us to assess and manage risk, we can share details about your financial situation and financial history with CRAs, fraud prevention agencies, etc. This includes information on any bank accounts or credit you have with us, including:

- how you manage your accounts;
- if you owe us money;
- if we have concerns about financial crime;
- if you have not kept up with your payments or paid off any amount you owe us, unless there is a genuine dispute over how much you owe us, or if you have agreed and stuck to a repayment plan.

Fraud prevention agencies

We will carry out checks with fraud prevention agencies for the purposes of preventing fraud and money laundering, and to confirm your identity before we provide products and services to you. These checks require us to process personal information about you.

The personal information you provide or which we have collected from you, or received from third parties, will be used to carry out these checks in order to prevent fraud and money laundering, and to verify your identity. We will process personal information such as your name, address, date of birth, contact details, financial information, employment details, and device identifiers for example, IP address.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime. We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering and to confirm your identity. This allows us to protect our business and to comply with laws that apply to us. This processing is also a contractual requirement of any of our products or services you use.

Fraud prevention agencies can hold your personal data for different periods of time. If they are concerned about a possible fraud or money laundering risk, your data can be held by them for up to five years.

Consequences of processing

If we, or a fraud prevention agency, have reason to believe there is a fraud or money laundering risk, we may refuse to provide the services and credit you have asked for. We may also stop providing existing products and services to you.

A record of any fraud or money laundering risk will be kept by the fraud prevention agencies. This may be used to enhance fraud detection models, and may also result in others refusing to provide services to you. The information we hold about you could make it easier or harder for you to get credit in the future.

What we need from you

You are responsible for making sure the information you give us is accurate and up to date, and you must tell us if anything changes as soon as possible. If you give information for another person - for example, a joint account holder, a beneficiary under an insurance policy or a dependant, you'll need to direct them to this notice.

How we keep your information secure

We use a range of measures to keep your information safe and secure which may include encryption and other forms of security. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information.

How we process your information

We will use your information for purposes including:

- **To deliver our products and services:** administer your accounts, or process your transactions. We will do this in order to perform our contract with you;
- **Banking operations support:** we will use your information to allow the provision and function of our banking services in line with regulation, laws and customer rights and interests, for example, complaints management and exit management. The lawful reasons for processing these are legitimate interest, legal obligation and in order to perform our contract with you;
- **Risk management:** we will use your information to measure, detect and prevent the likelihood of financial, reputational, legal, compliance or customer risk. This includes credit risk, traded risk, operational risk and insurance risk - for example, for underwriting or claims management purposes. We will do this because we have a legitimate interest in ensuring that we carry out a proper risk assessment prior to providing credit, insurance or other finance;
- **Product and service improvement:** we will look at your information to identify possible service and product improvements. Where we provide you with aggregated information services, we will use your information to understand how you use these products which may include your transactional information from other financial institutions to help improve our products and services. The lawful basis for processing your information for this purpose is our legitimate interest. We do this to improve our products and services to best meet the needs of our customers;
- **Data analytics:** we will look at your information to identify opportunities to promote products and services to existing or prospective customers and to understand how our products and services are used. For example, this may include reviewing historical customer transactional behavior, comparison of customer activity or it may include an analysis of your transactional information or financial institutions. We do this to help us provide you with products and services we think will be of most relevance to you. The lawful basis for using your information in this way is our legitimate interest;
- **Marketing:** We will use your information to provide you with information about our products and services, and also products and services from our partners and other relevant third parties. This includes marketing by post, email, telephone, text, secure messages, Mobile app or advertising to you and other people online and on social media. The lawful basis for this is our legitimate interest. We may need your permission to communicate by certain channels and We will always make sure we get this where we need to. You can change your mind on how you receive marketing messages or choose to stop receiving them at any time.
- **Protecting our legal rights:** we may need to use your information to protect our legal rights, for example, in the case of defending or the protection of legal rights and interests - for example, collecting money owed, enforcing or protecting our security or defending rights of intellectual property; court action; managing complaints or disputes; in the event of a restructuring of companies or other mergers or acquisition. This may be in connection with action taken against you or other persons, for example, joint borrowers or

persons who give a guarantee or other security for your obligations to us. We do this on the basis that it is in our legitimate interest

Accessibility

If you need any of this information in a different format, please let us know. This includes large print, braille, or audio. You can speak to us using the live chat on our website or by giving us a call.

There are also lots of other options available to help you communicate with us. Some of these are provided by third parties who are responsible for the service.