



**BANKING  
CIRCLE**

## Privacy Policy

Date

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## 1. General information

### (a) Introduction

In Australia, Banking Circle is a business name of Australian Settlements Limited, (ABN 14 087 822 491). Banking Circle is a subsidiary of Banking Circle S.A. (BCSA), a public limited liability company (société anonyme), established in Luxembourg, and regulated as a credit institution under the direct supervision of the Luxembourg financial supervisory authority the Commission de Surveillance du Secteur Financier. BCSA and its affiliated companies and subsidiaries, including Banking Circle, are committed to protecting your privacy. As a global company, BCSA has its head office, branches and subsidiaries in different jurisdictions which are responsible for the personal information which they collect independently, and which may be processed on their behalf by BCSA.

Banking Circle is bound by the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth). This Privacy Notice explains in detail the types of personal information we may collect about you and what we do with your personal information. It also sets out what we do to keep your personal information secure, as well as your rights in relation to the personal information we hold about you.

### (b) Importance of personal information protection

We appreciate that the use of your personal information has important implications for us, and we take our responsibilities extremely seriously. BCSA's head office, branches and subsidiaries operate in countries which regulate the use of personal information. To ensure that we handle personal information properly, we have adopted a global approach to privacy protection. While we have adopted a global approach to privacy protection, we ensure that we comply with all local laws in each jurisdiction in which we operate.

### (c) Purpose of this Privacy Notice

This Privacy Notice tells you what you can expect from us in relation to the collection and processing of your personal information. It is important that you read this Privacy Notice together with any other communication we may provide to you on specific occasions when we are collecting or processing your personal information, so that you are fully aware of how and why we are using your personal information. This Privacy Notice has two main parts:

**Part 1:** This part provides general information about our approach to personal information. We need to provide this information to everybody.

**Part 2:** This part provides specific details about what information we collect, why, and what we use it for, based on the specific reason why we have your personal information. If you wish, you can easily select the reason we have your information and see what we do with it. We'll tell you:

- why we are able to process your information;
- what purpose we are processing it for;
- whether you have to provide it to us;
- how long we store it for;
- whether there are other recipients of your personal information;



- whether we intend to transfer it to another country; and
- whether we do automated decision-making or profiling.

#### (d) Banking Circle S.A. as data controller under GDPR

As BCSA is regulated as a bank in Luxembourg, it is subject to the General Data Protection Regulation (GDPR). GDPR regulates the use of personal data in the European Union and the European Economic Area and of European citizens defines two types of entities – Data Controllers and Data Processors. BCSA might be a Controller for some activities and a Processor for others but cannot be both for the same processing activity.

Data Controllers have ultimate control of the processing in question and full responsibility for Data Protection compliance. A Processor by contrast processes on behalf of a Controller, e.g. outsourced payroll providers, and has more restricted liability. The existence of a Data Processor, therefore, implies a Data Controller. The relationship between Controllers and Processors is always a matter of fact but by law must also be documented in a written contract.

The accepted industry position is that banks are controllers not processors in relation to financial services, irrespective of whether the client is a person or an institution and irrespective of the volume of transactions. BCSA is fully liable for these processing activities whether done in-house or outsourced. The basis for this is that as a regulated entity much of BCSA's processing is to meet its statutory obligations and BCSA determines the purpose and means of any other processing it carries out in providing financial services, e.g. BCSA, not the client, will decide what personal data to collect and apply its own judgement to it when processing payments such as beneficiary name and account information. Despite the overlap between data protection and payment operations terminology, BCSA is not a data processor when processing payment instructions from its clients.

BCSA may also process information on employees of our clients and of any company interested in knowing more about our services as well as any of our contractors.

#### (e) Banking Circle Group's contact details

You can contact the Banking Circle Group by sending us an email to our Data Protection Officer, at [privacy@bankingcircle.com](mailto:privacy@bankingcircle.com).

The postal address of our head office is:

**Banking Circle S.A.**  
 Attn: Data Protection Officer  
 2 boulevard de la Foire  
 L-1528 Luxembourg



You can also reach us at the following addresses:

**Banking Circle (Australia)**

Attn: Data Protection Officer  
Level 11, 345 George Street  
Sydney, NSW 2000  
Australia

**Banking Circle Denmark, Filial af Banking Circle S.A., Luxembourg**

Attn: Data Protection Officer  
Lautrupsgade 13-15  
2100 Copenhagen  
Denmark

**Banking Circle S.A. UK Branch**

Attn: Data Protection Officer  
24 King William Street,  
London, EC4R 9AT  
UK, England

**Banking Circle S.A. – German Branch**

Attn: Data Protection Officer  
Maximilianstrasse 54, D-80538  
Munich,  
Germany

For general contact please use this page of our website.

<https://www.bankingcircle.com/contact-us>

## (f) How do we get personal information?

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have made a complaint or enquiry to us.
- You have made an information request to us.
- You wish to attend, or have attended, an event or a webinar.
- You have answered a survey on our products & services on behalf of one of our clients.
- You subscribe to our e-newsletter.
- You have applied for a job with us.

We also receive personal information indirectly, in the following scenarios:

- One of our clients has shared your contact details with us.
- You are the ultimate beneficial owner of your organisation that has shared your data with us.
- You are representing your organisation that has shared your data with us.
- You are an authorised signatory for one of our clients.
- You have made a payment to our clients or their customers.
- You have been sent a payment by our clients or their customers.



Banking Circle does not collect, use or disclose credit information or credit eligibility information, other than identification information.

If it is not disproportionate or prejudicial to us, we will contact you to let you know we are processing your personal information.

As part of our regulatory and corporate functions, we also process criminal conviction data on certain individuals.

## (g) Your data protection rights

Under applicable data protection laws, you have certain rights we need to make you aware of. The rights available to you depend on our reason for processing your personal information. You are not required to pay any charge for exercising your rights.

In accordance with the APPs, we will respond to your requests for access within 30 days, and in the manner of your choosing, if practicable.

Please contact us at [privacy@bankingcircle.com](mailto:privacy@bankingcircle.com) if you wish to make a request.

Your rights:

### 1. Right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exceptions, which means you may not always receive all the information we process.

Please note that you will have to verify your identity and make a request to us before we can provide you with the personal information we hold about you.

### 2. Right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

### 3. Right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

If you wish to exercise your right to erasure, in complying with your request, we will not retain any information pertaining to your request once that request has been completed unless we have a legal or regulatory duty to do so.

### 4. Right to withdraw consent

Where you have given us your consent to process your personal information, you have the right to change your mind at any time and withdraw that consent.

### 5. Right to lodge a complaint

You have the right to lodge a complaint with the Office of the Australian Information Commissioner (OAIC) and/or Banking Circle regarding our management of your personal



information. Further details can be found under the “*Your right to complain*” section of this Privacy Notice.

#### **6. Right to restriction of processing**

You have the right to ask us to restrict the processing of your personal information in certain circumstances.

#### **7. Right to object to processing**

You have the right to object to processing, if we process your personal information because the process is in our legitimate interests or for direct marketing purposes.

#### **8. Right to data portability**

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated.

If we are processing your information for criminal law enforcement purposes, your rights are slightly different. Please see the relevant section of the notice.

#### **9. Right not to be subject to automated decisions**

You have a right not to be subject to a decision which is based on automated processing where the decision will produce a legal effect or a similarly significant effect on you.

We will use your personal information provided as part of your request to exercise your data protection rights to help respond to your request. With one exception (listed below) we will keep your request, any personal information (often referred to as an appendix or appendices) and any complaint or correspondence related to the request for 3 years after completion for monitoring purposes.

### **(h) Disclosing your personal information**

We will not disclose your personal information to any third parties for the purpose of direct marketing. We may provide personal information about individuals to participants in the payments system and other financial institutions for the purpose of processing payment transactions.

We may also provide information to other members of the Banking Circle Group and/or trusted third parties who assist us in operating our website, conducting our business, or servicing our clients.

We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Where we disclose personal information to another member of the Banking Circle Group and/or to a trusted third party, we will only do so where that party agree to keep the information confidential and in accordance with the requirements of the Privacy Act.



In some circumstances we are legally obliged to share information. For example, under a court order or where we cooperate with our regulatory supervisory authorities or other public bodies in handling complaints or investigations. In any scenario, we'll satisfy ourselves that we have a lawful basis on which to share the information and document our decision making and satisfy ourselves we have a legal basis on which to share the information.

For a list of our main data processors see our data and outsourcing addendum available at  
<https://www.bankingcircle.com/terms-of-use>

### **(i) Sending your personal information overseas**

In some instances, we may send your information to organisations outside of Australia. Generally, we will only send your information to locations in the European Union, the European Economic Area and the United Kingdom. In this scenario, we will take such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the APPs including by having in place a framework for data handling and security.

### **(j) Links to other websites**

Where we provide links to websites of other organisations, this Privacy Notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

### **(k) Your right to complain**

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact us at [privacy@bankingcircle.com](mailto:privacy@bankingcircle.com) and we'll respond.

If you remain dissatisfied, you can make a complaint about the way we process your personal information to the following authorities:

If you are resident in Australia:

Office of the Australian Information Commissioner  
GPO Box 5288  
Sydney NSW 2001  
Contact Link:  
<https://www.oaic.gov.au/>

If you are resident in Denmark:

Datatilsynet  
Borgergade 28, 5  
1300 København K  
Denmark  
Telefon +4533193200  
Fax +45 3319 3218  
Email: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)



If you are resident in the UK:

Information Commissioner's Office

Wycliffe House, Water Lane

Wilmslow

SK9 5AF Cheshire

The UK

Tel: +44 303 123 1113 (local rate)

or +441625 545 745

Fax: 01625 524 510

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

If you are resident in Germany:

Landesamt für Datenschutzaufsicht

Promenade 18

91522 Ansbach

Germany

Tel: +49 (0) 981 180093-0

Fax : +49 (0) 981 180093-800

Email: [poststelle@lfd.bayern.de](mailto:poststelle@lfd.bayern.de)

If you are resident in Singapore:

Personal Data Protection Commission (PDPC) Singapore

10 Pasir Panjang Rd, MBC,

Singapore 117438

Contact Link:

<https://www.pdpc.gov.sg/>

If you are resident in Luxembourg or anywhere else:

National Commission for Data Protection (CNPD)

1, avenue du Rock'n'Roll

L-4361 Esch-sur-Alzette

Luxembourg

Tel.: (+352) 26 10 60-1

Contact Link: <https://cnpd.public.lu/en/support/contact.html>

## 2. Reason for us having your personal information

### (a) Make an enquiry about our services

#### Purpose and lawful basis for processing

When you contact us to make an enquiry, we collect information, including your personal information, so that we can respond to it.



The lawful basis we rely on for processing your personal information is your consent.

#### **What we need and why we need it**

We need enough information from you to answer your enquiry. If you contact us via email, we'll need a return address for response. We also merge this information with engagement touchpoints you have had with us, to help us measure and optimise the marketing information that you consent to receive.

#### **What we do with it**

We'll set up a file on our system to record your enquiry and so we can get it to the correct area of the business to be dealt with. We'll also keep a record of our response. We use the information supplied to us to deal with the enquiry.

#### **How long we keep it**

We will keep the information for a reasonable period and then delete it. Normally we will not keep this information for more than 12 months after its deletion.

#### **What are your rights?**

You have the right to object to our processing of your personal information. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

For more information on your rights, please see the section entitled 'Your data protection rights' above.

## **(b) Make a complaint**

#### **Purpose and lawful basis for processing**

When you contact us to make a complaint, we collect information, including your personal information, so that we can respond to it and fulfil our regulatory responsibilities.

#### **What we need and why we need it**

We need information from you to investigate your complaint properly such as name, address, issue you have experienced with our services.

When we receive a complaint from you, we'll set up a case file. This normally includes your contact details and any other information you have given us about the other parties in your complaint such as the beneficiaries of your payments.

We need to know the details of your complaint so we can investigate it and fulfil our regulatory obligations.

#### **What we do with it**

We will use your personal information to investigate your complaint. We compile and share statistics showing information like the number of complaints we receive with our regulatory supervisory authorities, but not in a form that identifies anyone.

No third parties have access to your personal information unless the law allows them to do so. However, if you have made a complaint related to the provisions of services by one of our clients or their customers, we usually have to disclose your identity to them. This is so we can clearly explain to



them what you think has gone wrong and so they can handle your complaint directly. This also means we may receive information about you from them.

If you are acting on behalf of someone making a complaint, we'll ask for information to satisfy us of your identity and if relevant, ask for information to show you have authority to act on someone else's behalf.

#### **How long we keep it**

We keep the personal information relating to you for as long as is necessary in order to enable us to provide the relevant services to our clients, after which we will delete it or anonymise it. Normally, we will not keep this information for more than 10 years following termination of the relationship with our clients.

#### **What are your rights?**

You have the right to object to our processing of your personal information. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

For more information on your rights, please see the section entitled 'Your data protection rights' above.

### **(c) You are the ultimate beneficial owner and /or legal representative of one of our clients or prospects**

#### **Purpose and lawful basis for processing**

When we enter into a business relationship with our clients, we collect information, including your personal information, so that we can comply with our anti-money laundering and counter-terrorism financing (AML/CFT) due diligence obligations.

We also ensure that the person entering into the business relationship with us on behalf of our clients and signing the contractual arrangement we have with our clients, is duly authorised as legal representative to make such decisions on behalf of our clients.

The lawful basis we rely on to process your personal information is legal obligation, which allows us to process personal information when this is necessary to comply with any applicable AML/CFT laws we are subject to.

#### **What we need**

- Full name
- Address
- Salutation (If applicable)
- Maiden Name (If applicable)
- Date of birth
- Place of birth
- Nationality
- Proof of residency
- Proof of Identity
- Proof of ID number i.e. (passport number)
- Job position
- TIN / TFN



- Tax residency
- Criminal convictions and offences

#### **Why we need it**

For the purpose of identifying the true beneficial owners and legal representatives of our clients and to comply with our Know Your Clients obligations under any applicable AML/CFT laws we are subject to.

To satisfy our reporting obligation to the tax authorities under the tax cooperation treaty with the United States or other countries of the OECD.

To monitor any adverse media information associated with our clients.

#### **What we do with it**

We collect and retain your personal information in our client relationship management system to document the compliance with our legal obligations under any applicable AML/CFT laws we are subject to.

We process your data through our adverse media screening tool.

We may be obliged to share your personal information as part of a report regarding any suspicious activity or transactions on clients' activity to our regulatory supervisory authorities in countries where we operate. We may also share your personal information with our correspondent institutions involved in the payment chain upon request.

No other third parties may however have access to your personal information unless the law allows them to do so.

#### **How long we keep it**

We keep the personal information relating to you for as long as is necessary to enable us to provide the relevant services to our clients, after which we will delete it or anonymise it. Laws and regulations applicable in the various jurisdictions may set a minimum period for which we have to retain such personal information. Normally, we will not keep this information for more than 10 years following termination of the relationship with our clients.

#### **What are your rights?**

As a regulated institution, we are acting in our regulatory capacity to process your personal information, so you only have the right to object to our processing of your personal information in certain circumstances. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

For more information on your rights, please see the section entitled 'Your data protection rights' above.

## **(d) You are the payer or beneficiary of a payment executed via Banking Circle's infrastructure or the ultimate beneficial owner of the payer or beneficiary**

#### **Purpose and lawful basis for processing**

When we receive or make a payment from or to you for our clients and their customers, we collect



information, including your personal information, so that we can fulfil our regulatory obligations.

When you contact us to make an enquiry regarding a payment you have sent to or received from us, we collect information, including your personal information, so that we can respond to it.

The lawful basis we rely on to process your personal information is a legal obligation which allows us to process personal information when it is necessary to comply with a legal obligation under any applicable AML/CTF laws we are subject to, and your consent.

#### **What we need and why we need it**

Your name and address, bank account as well as transaction details.

For the purpose of detecting financial crimes patterns or criminal behaviour in payment transactions.

For the purpose of screening the same transactions against sanction lists published by government organisations in the countries where we operate.

For the purpose of passing on information to our correspondent institutions involved in the payment chain.

For reporting the true identity of the ultimate beneficial owner of a payment to local supervisory authorities where applicable.

If you have submitted an enquiry relating to a payment sent by our clients or their customers, we'll keep a record of your enquiry so we can respond to it. We'll also keep a record of our response. We use the information supplied to us to deal with the enquiry.

We usually have to disclose your identity to our clients. This is so we can clearly explain to them what you think has gone wrong and they can handle your enquiry directly. This also means we may receive information about you from them.

#### **What we do with it**

We collect and retain your personal information in our transaction platforms to document the transactions performed for our clients and their customers. We compile and share statistics in a deidentified form, showing information such as the number of payments we receive with our regulatory supervisors.

We use your personal information as well as any other information identifying you as payer or as beneficiary of a payment and any information related to the transactions underlying the payment we receive to feed, evaluate and further develop our transaction monitoring and sanction screening tool or applications to provide assurance that we have effective processes to identify, manage, monitor and report money laundering and terrorism financing risks we are or might be exposed to.

#### **How long we keep it**

We keep the personal information relating to you for as long as is necessary to enable us to provide the relevant services to our client and comply with our regulatory obligations, after which we will delete it or anonymise it. Laws and regulations applicable in the various jurisdictions may set a minimum period



for which we have to retain such personal information. Normally, we will not keep this information for more than 10 years following its collection.

#### **What are your rights?**

We are acting in our regulatory capacity to monitor your transactions, so you only have the right to object to our processing of your personal information in certain circumstances. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

For more information on your rights, please see the section entitled 'Your data protection rights' above.

### **(e) Apply for a job**

#### **Purpose and lawful basis for processing**

Our purpose for processing this information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process thereby enhancing your experience and journey as well as to protect the interests of Banking Circle and its clients.

We only process information that is necessary to perform a contract or to take steps at your request, before entering a contract.

We process information about applicants' criminal convictions and offences. This is for the purpose of complying with a legal obligation we are subject to as a regulated institution.

#### **What do we need at the application stage?**

- Full Name
- Address
- CV
- Contact information

#### **What we do with it**

If you use our online application system, your details will be collected by our data processor Talentech (which runs the platform, Talent Recruiter) on our behalf. We ask you for your personal details including name and contact details. We'll also ask you about previous experience, education, referees and for answers to questions relevant to the role. Our recruitment team will have access to all this information.

#### **Why we need it**

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it may affect your application if you don't. We will keep your data on file for 12 months to evaluate your candidacy for our other open roles. You can at any time exercise your rights to see what information we hold and request its erasure by sending an email to [privacy@bankingcircle.com](mailto:privacy@bankingcircle.com).

We will use any feedback you provide about our recruitment process to develop and improve our future recruitment campaigns.

#### **Shortlisting**

Our hiring managers and recruitment partners shortlist applications for interview.



## Assessments

We may ask you to participate in assessment days to complete tests or occupational personality profile questionnaires; attend an interview; or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes. This information is held by us.

If, after assessment, you are unsuccessful for the role, we generally keep your data on file in our talent pool for up to 12 months, in case other suitable roles arise. If you do not wish to stay in the talent pool you can at any time exercise your rights to see what information we hold and request its erasure by sending an email to [privacy@bankingcircle.com](mailto:privacy@bankingcircle.com).

## Conditional offer

If we make a conditional offer of employment, we'll ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We must confirm the identity of our staff and their right to work, and seek assurance as to their trustworthiness, integrity and reliability.

You must therefore provide:

- proof of your identity – you will be asked to send us copies of identification documentation
- proof of your qualifications – you will be asked to send us copies of diplomas or other relevant documentation
- proof of right to work (if applicable) – you will be asked to send us copies of work permit(s) and visa documentation
- a criminal records declaration to declare any unspent convictions and/or to provide a copy of an up-to-date criminal record, as applicable
- a declaration on no outside business interest (we will provide you with a template)
- proof of residence – in certain jurisdictions we may ask you to send us evidence of your current address.

Further to the above, we may carry out certain background checks to further assess your character and fitness for the job. We will not carry out any background checks without your prior consent. The background checks we carry out depend on the job position offered, but may involve credit checks, litigation checks including past or pending civil or criminal proceedings against candidates, sanctions screenings and adverse media checks.

We will ask you to provide us with references as part of the background check. Once you have sent us your references' contact information we will reach out to directly and obtain the reference. Depending on the location of the job position we'll also ask you to complete a questionnaire about your health to establish your fitness to work.

Any documents that you share with us electronically will be shared on a secure connection via a link that we provide to you.

## How long is your personal information kept?

If you are employed by us, for the duration of your employment and then for a further period of up to 5 years, after which the information will normally be deleted.



If you are an unsuccessful applicant, for up to 12 months after your application, after which we will delete it unless we have agreed otherwise with you or we have a legal obligation to store such data longer.

#### How we make decisions about recruitment

Final recruitment decisions are made by hiring managers and members of our recruitment team. We take account of all the information gathered during the application process.

You can ask about decisions on your application by speaking to your contact in our recruitment team.

#### Your rights

You have the right to object to our processing of your personal information. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

For more information on your rights, please see the section entitled 'Your data protection rights' above.

### (f) You are or represent a third-party contractor of Banking Circle

#### Purpose and lawful basis for processing

We collect information to assess your suitability for the services you or your company will provide as well as to protect Banking Circle and its clients against any fraud.

The lawful basis we rely on for processing your personal information relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

We process information about you as representative of a third-party contractor or you as a third-party contractor. The lawful basis we rely on to process this data pertains to complying with a legal obligation we are subject to as regulated institution and of the legitimate interests of Banking Circle and its clients.

#### What do we need?

1. Full Name
2. Title
3. Address
4. CV
5. Tax number
6. Contact information
7. Bank account holding statement

Further to the above, we may carry out certain background checks to further assess your character and fitness for the service to be provided. The background checks we carry out depend on the required service, but may involve the following:

1. Fitness and Propriety declaration (including credit issues, directorships and convictions)
2. Credit/financial information
3. Information pertaining to a sanctions screening
4. Publicly available adverse news articles and information
5. Current and previous director appointments and information on disqualifications
6. Information on civil litigation and bankruptcy



### What we do with it

We'll use all the information you provide during the supplier selection process to progress your and/or your company's engagement with a view to entering into an engagement letter/ consultancy agreement with you or your company, or to fulfil legal or regulatory requirements if applicable.

We will not share any of the information you provide with any third parties for marketing purposes.

We'll use the contact details you give us to contact you to progress your and/or your company's engagement. We may also contact you to request your feedback about our supplier selection process.

### Why we need it

The information we ask for is used to assess your suitability for the provision of the services. You don't have to provide what we ask for but it may affect your and your company's engagement if you don't.

We will use any feedback you provide about our supplier selection process to develop and improve our process.

### Your rights

You have the right to object to our processing of your personal information. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it. Your objection to us processing the necessary personal information may affect your application and any job offer we make to you.

For more information on your rights, please see the section entitled 'Your data protection rights' above.

## (g) You are the person of contact of an employee of Banking Circle

### Purpose and lawful basis for processing

We request every employee to provide us with the contact details of a person of contract that we can reach should anything happen to the employee during their time at work.

The lawful basis we are relying on to process your personal information is legitimate interest which allows us to process personal information for the legitimate interests of Banking Circle or of its employees.

### What we need and why we need it

- Full name
- Phone number

To contact the family's employee should anything happen to the employee during their time at work.

### What we do with it

We collect and retain your personal information in our employee management system to document.

No third have access to your personal information unless legally permitted.

### How long we keep it

As long as the employee remains employed by Banking Circle.



### What are your rights?

As an employer, we are acting in our regulatory capacity to process your personal information, so you have the right to object to our processing of your personal information. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

For more information on your rights, please see the section entitled 'Your data protection rights' above.

## (h) Respond to our consultation requests and surveys

### Purpose and lawful basis for processing

With your consent, we might contact you from time to time to obtain user experience and client satisfaction about Banking Circle user interface or other applications and we might process your contact details to get in touch with you.

As a participant in user tests and research about Banking Circle's user interface, applications and platforms we will ask you to provide certain personal information to be able to contact you, and to verify your profile in the user tests.

The lawful basis we are relying on to process your personal information is legitimate interest, which allows us to process personal information to pursue a legitimate interest of Banking Circle.

### What we need and why we need it

- Full name
- Job title
- Work-email
- Work phone-number
- Behaviour on and thoughts about the user experience.

We will process all data provided as part of your participation with the purpose of developing our offerings. As a rule, we will not share any personal information unless agreed upon. We will only publish results or direct quotes including your job role, company and/or name on our website, social media accounts and other externally accessible sources, if agreement with you has been made and consent has been granted.

### What we do with it

We process the information internally for the above stated purpose. We don't intend to share your personal information with any third party. Any specific requests from a third party for us to share your personal information with them will be dealt with in accordance the provisions of the data protection laws.

### How long we keep it

We will retain consultation and survey response information until our work on the subject matter of the consultation is complete and then normally for a period of 2 years after which we will delete it (or anonymise it if it is required for further research after that point).

### What are your rights?

You have the right to object to our processing of your personal information. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.



For more information on your rights, please see the section entitled 'Your data protection rights' above.

## (i) Attend an event, seminar or workshop

### **Purpose and lawful basis for processing**

Our purpose for collecting this information is so we can facilitate the event.

The lawful basis we rely on for processing your personal information is your consent. When we collect any information about dietary or access requirements, we also need your consent as this type of information is classed as special category data.

### **What we need and why we need it**

If you wish to attend one of our events, you will be asked to provide your contact information including your organisation's name and, if offered a place, information about any dietary requirements or access provisions you may need. We may also ask for payment details if there is a charge to attend.

We use this information to facilitate the event. We also need this information so we can contact you.

### **What we do with it**

If you are not successful in securing a place, we'll let you know and hold your details on a reserve list in case a place becomes available.

If you are allocated places at an event, we'll ask for information about any dietary/access requirements. We don't share this information in any identifiable way with the venue, and we delete it after the event.

We don't publish delegate lists for events.

### **How long we keep it**

As long as reasonably necessary for the purposes of organising the event and then for up to 10 years afterwards, after which we will delete it.

### **What are your rights?**

We rely on your consent to process the personal information you give us to facilitate the event. This means you have the right to withdraw your consent at any time. If at any point you want to withdraw your consent please email [marketing@bankingcircle.com](mailto:marketing@bankingcircle.com). If you do that, we'll update our records immediately to reflect your wishes.

For more information on your rights, please see the section entitled 'Your data protection rights' above.

## (j) Subscribe to our newsletters

### **Purpose and lawful basis for processing**

Our purpose for collecting the information is so we can provide you with a service and let you know about upcoming events.

The lawful basis we rely on for processing your personal information is your consent.



### **What we need and why we need it**

Your name and email address.

We use your email address to send you our E-newsletter.

### **What we do with it**

We only use your details to provide the service.

We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter.

You will receive a confirmation email once you have submitted your details and then the newsletters monthly.

### **How long we keep it**

We will keep the personal information for a reasonable period consistent with sending you marketing communications, after which we will either confirm that you are happy for us to continue to do so, or delete it (except to the extent we need to retain it for the sole purpose of suppressing further marketing communications to you).

### **What are your rights?**

We rely on your consent to process the personal information you provide to us for marketing purposes. This means you have the right to withdraw your consent, or to object to the processing of your personal information for this purpose at any time. If at any point you want to withdraw your consent please email us at [info@bankingcircle.com](mailto:info@bankingcircle.com). If you do that, we'll update our records immediately to reflect your wishes.

For more information on your rights, please see the section entitled 'Your data protection rights' above.

## **(k) Request our white papers or other publications**

### **Purpose and lawful basis for processing**

Our purpose for collecting this information is to carry marketing activities and business development.

The lawful basis we rely on for processing your personal information is your consent.

### **What we need and why we need it**

Your name, job position and address details.

So that we can send you the publications you have requested. We also merge this information with engagement touchpoints you have had with us, to help us measure and optimise the marketing information that you consent to receive.

### **What we do with it**

We only use the contact details to provide this service. We run statistical reports on the types and quantities of publications requested for monitoring purposes, but this does not contain any personally identifiable information.



## How long we keep it

We will keep the personal information for a reasonable period consistent with sending you marketing communications, after which we will either confirm that you are happy for us to continue to do so, or delete it (except to the extent we need to retain it for the sole purpose of suppressing further marketing communications to you).

## What are your rights?

We rely on your consent to process the personal information you provide to us for marketing purposes. This means you have the right to withdraw your consent, or to object to the processing of your personal information for this purpose at any time. If at any point you want to withdraw your consent, please email us at [marketing@bankingcircle.com](mailto:marketing@bankingcircle.com). If you do that, we'll update our records immediately to reflect your wishes.

For more information on your rights, please see the section entitled 'Your data protection rights' above.

## (I) You are a visitor to our offices

We meet visitors at our offices, including:

- consultants, advisors and external auditors
- external training providers
- job applicants
- suppliers and tradespeople
- board members and representatives of our shareholders
- representatives of our regulatory supervisory authorities.

If your visit is planned, we'll send your name, position and purpose of visit to the reception before your visit.

We ask all visitors to sign in and out at reception and show a form of ID. The ID is for verification purposes only; we don't record this information.

The purpose for processing this information is for security and safety reasons.

Closed-circuit television (CCTV) might operate outside the building for security purposes. Any CCTV used in our Luxembourg office or our offices in Germany, the UK or Denmark is not operated by us, so we are not the controller. It will be under the control of the relevant building landlord.

We have Wi-Fi on site for the use of visitors. We'll provide you with the address and password.

We record the device address and will automatically allocate you an IP address whilst on site. We also log traffic information in the form of sites visited, duration and date sent/received.

We don't ask you to agree to terms, just to the fact that we have no responsibility or control over your use of the internet while you are on site, and we don't ask you to provide any of your information to get this service.

The purpose for processing this information is to provide you with access to the internet whilst visiting our site.



We keep the personal information relating to you for as long as is necessary in order to enable us to provide the relevant services to our client, after which we will delete it. Normally, we will not keep this information for more than 12 months following its collection.

For more information on your rights, please see the section entitled 'Your data protection rights' above.

## (m) You are an investor in Banking Circle

### Purpose and lawful basis for processing

We will only collect and process personal information about you, which is considered necessary for Banking Circle to comply with its regulatory compliance and corporate governance obligations.

The lawful basis we rely on to process with respect to the majority of your personal information is legal obligation. This allows us to process personal information when this is necessary to comply with a legal obligation. We may also process your personal information on the basis of legitimate interests of Banking Circle as regulated institution.

### What we need and why we need it

- Full name
- Address
- Salutation (If applicable)
- Maiden Name (If applicable)
- Date of birth
- Place of birth
- Phone number
- e-mail address
- Nationality
- Proof of residency
- Proof of Identity
- Proof of ID number i.e. (passport number)
- Social security
- Job position and title
- CV
- Job location
- Work e-mail address
- Work phone number
- TIN
- Tax residency and taxes
- Criminal convictions and offences
- Salary and other compensation
- Bonus
- Bank account number

To satisfy our regulatory compliance and corporate governance obligations.



### What we do with it

We may make available your personal information to supervisory entities, correspondent institutions, or other financial institutions but also legal advisors, corporate service providers or external auditors.

Certain personal information will also be reported to government authorities where required by law and for tax or other purposes.

### How long we keep it

We keep the personal information relating to you for as long as is necessary in order to comply with our regulatory obligations, after which we will delete it or anonymise it. Laws and regulations applicable in the various jurisdictions may set a minimum period for which Banking Circle has to retain such personal information. Normally, we will not keep this information for more than 5 years following termination of your investor relationship with Banking Circle.

Copies of Criminal records and background checks will be deleted when the request for which it was collected has been answered.

### What are your rights?

As a regulated institution, we are acting in our regulatory capacity to process your personal information, so you have the right to object to our processing of your personal information. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

For more information on your rights, please see the section entitled 'Your data protection rights' above.

