

## Customer Privacy Statement: How Chang Hwa Commercial Bank London Branch uses your personal information

This privacy statement sets out what personal data Chang Hwa Commercial Bank London Branch ('the Bank') (under the register number BR000414 with registered address at 4F, 6-8 Tokenhouse Yard, London EC2R 7AS) collects about you, what the personal data is used for, the legal basis which permits us to use it and the safeguards we put in place to protect it. It also sets out your rights and how to lodge a complaint in relation to personal data.

### Contact details

We have appointed a data protection officer who has responsibility for advising us on our data protection obligations. You can contact our Data Protection Officer using the details below:

Address: The Data Protection Officer  
Chang Hwa Commercial Bank London Branch  
4th Floor, 6-8 Tokenhouse Yard, London EC2R 7AS  
Tel: 0207 600 6600  
Email: [dataprotection@chblondon.com](mailto:dataprotection@chblondon.com)

### What is personal data?

Personal data is any information that tells us something about you. This could include information such as your name, contact details, date of birth and bank account details.

### How do we collect personal data?

We collect personal data about you from various sources including:

- from you when you contact us directly through the account application process during our business relationship with you or a customer you are connected to.
- from third party banks when we carry out loan syndication activities.

### What Personal Data we collect

In order to meet the UK GDPR and data protection requirements, the Bank may collect some or all of following personal data whether you are in the UK, outside the UK, from time to time:

We collect the following information directly from you:	We collect the following information from third parties:
Name	Sanctions information, if any
Title	PEP information, if any
Date of Birth	Mortality information, if any
Contact details such as current and previous address, contact number, email address	Bankruptcy/insolvency information, if any
Nationality	Information about criminal convictions and offences committed, if any
Citizenship Status	Electoral roll information, if any
Employment Status	Telephone directory, if any
Income Details	Adverse media information
Employer Contact Details	Credit history

Source of Funds and Source of Wealth	Directorship information in an entity
Visa Status	Persons of significant control in an entity
ID Document Number (usually passport or driving licence)	
Other bank account details	
Voice recording (if you call our office)	
CCTV footage	
Tax residency(ies)	
Tax identification number(s)	
National Insurance number	
Birth details such as town/city/country of birth	
Details of public position held if you are a Politically Exposed Person	
Details of public positions held by your immediate family, i.e., spouse, partner, children and their spouses and partners, parent if they are Politically Exposed Persons	
Details of public positions held by your close associates if they are Politically Exposed Persons	
Residential property ownership status	
Security information to enable you to access your account and verify your identity	
Signatures	

Additionally, we may monitor or record phone calls with individuals in case the we need to check we have carried out customers instruction correctly, to resolve queries or issues, for regulatory purposes, to help improve the Bank's quality of service, and to help detect or prevent frauds. Conversations may also be monitored for staff training purposes.

For the protection of safety of our customers, visitors and employees, we also operate CCTV in our premises.

***Purposes of Data Collection and Our Legal Basis for Doing So***

Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so as set out in the data protection legislation. We rely on the following legal bases to use your information for business-related purposes:

- Where we need to use your personal information in order to enter into a contract with you or to perform a contract with you to provide banking services.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

In more limited circumstances we may also rely on the following legal bases:

- Where we need to protect your interests (or someone else's interests)
- Where it is needed in the public interest or for official purposes

There are additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data. We may process criminal conviction information where we need to do so to comply with our regulatory obligations. In the table below we set out an explanation of the purposes for which we use your personal information and the legal bases that permit us to use your personal information for those purpose. Where appropriate, we have also identified our legitimate interests in processing your personal data.

We may process your personal information for more than one legal basis depending on the specific purpose for which we are using your personal data. Please contact us if you need details about the specific legal basis we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose and/or activity	Legal basis for processing
To make decisions about providing credit to you or a customer you are connected to	<ul style="list-style-type: none"> <li>• Contractual necessity</li> <li>• Legitimate interests: carry out checks and use your information to make decisions about lending to a business to which you are connected</li> </ul>
To comply with our regulatory duties, including regulatory reporting	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>
To assess customer transactions from a finance, management and regulatory perspective	<ul style="list-style-type: none"> <li>• Legitimate interests: assess the nature of transactions being undertaken in order to make improvements to the way that we operate and to manage risks</li> </ul>
For business management and planning purposes, including accounting, auditing and compliance with statutory record keeping requirements	<ul style="list-style-type: none"> <li>• Legal obligation</li> <li>• Legitimate interests: analyse the performance of our business and to assist with financial planning and decisions</li> </ul>
To deal with legal disputes	<ul style="list-style-type: none"> <li>• Legitimate interests: to protect our legal position</li> </ul>
For fraud and financial crime prevention	<ul style="list-style-type: none"> <li>• Legitimate interests: to protect our business and our customers against fraud and financial crime</li> </ul>

Purpose and/or activity	Legal basis for processing
To make/receive payments	<ul style="list-style-type: none"> <li>Contractual necessity</li> </ul>

***What happens if you do not provide the personal data that we request?***

We need some of your personal data in order to perform our contract with you. We also need some personal data so that we can comply with our legal obligations.

Where personal data is needed for these purposes if you do not provide it we will not be able to perform our contract with you. We explain when this is the case at the point where we collect personal data from you.

***How do we share your personal data?***

We share your personal information in the following ways:

- We share customer information with Chang Hwa Commercial Bank Limited in Taiwan (Parent Bank) so that they can provide us with IT services. We also share customer information with the Parent Bank for regulatory purposes, so that the Bank can comply with Taiwanese regulatory requirements.
- When we use service providers to help us deliver our services to you or to administer your accounts we share customer information with those service providers. This may include IT service providers, debt recovery agents and other service providers.
- We share customer information with our regulators (both in the UK and in Taiwan) when we have a regulatory duty to do so.
- We share customer information with the police and with criminal investigation agencies in the UK and in Taiwan where necessary for the purposes of preventing, detecting or investigating crime.
- In some circumstances we have legal obligations to report suspected criminal activities to relevant authorities. This includes where we suspect money laundering or other criminal activities.
- We will disclose customer information when it is necessary to do so to protect the Bank's interests or to pursue a legal claim.
- If you have a joint account or if you have authorised another person to act on your behalf, your information will be shared with the joint account holder or authorised user (as applicable).
- We share your information with fraud prevention agencies. If you provide us with false or inaccurate information and fraud is identified, we will pass details of the fraud to fraud prevention agencies to prevent fraud and money laundering.
- We share your information with our Parent Bank in Taiwan for credit approval in order for us to provide loan services to you.
- If we sell any part of our business and/or integrate it with another organisation your details may be disclosed to our advisers and to prospective purchasers or joint venture partners and their advisers. If this occurs the new owners of the business will only be permitted to use your information in the same or similar way as set out in this privacy policy.

Where we share your personal information with third parties we ensure that we have appropriate measures in place to safeguard your personal information and to ensure that it is solely used for legitimate purposes in line with this Privacy Policy.

### ***Retention Period of Personal Data***

As a general rule we keep your personal information for the duration of our contract with you or the customer to which you are connected (as applicable) and for a period of 7 years after that contract ends. However, where we have statutory obligations to keep personal information for a longer period or where we may need your information for a longer period in case of a legal claim, then the retention period may be longer.

Data will be deleted from our systems in accordance with the law and our technical capabilities.

### ***Safeguarding of Personal Data and Transfer Overseas***

The security of personal data is crucial to us. When personal data is transferred to countries outside of the UK those countries may not offer an equivalent level of protection for personal data to the laws in the UK. Where this is the case we will ensure that appropriate safeguards are put in place to protect your personal data.

The countries to which your personal data is transferred and the safeguards in place are detailed below:

Taiwan (Parent Bank)	Our Parent Office in Taiwan provides IT support and credit approval.	We rely on the EÜ standard contractual clauses for the transfer of personal data to third countries.
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If you would like to see a copy of the adequacy mechanisms that we use to protect your personal data please contact [dataprotection@chblondon.com](mailto:dataprotection@chblondon.com).

We do not share your personal data with marketing companies. The use of personal data will be kept to the minimum and strictly for the purposes listed above. Personal data will be held securely and treated confidentially by the Bank.

### ***Your Rights***

You have a number of rights in relation to your personal data, these include the right to:

- be informed about how we use your personal data;
- obtain access to your personal data that we hold;
- request that your personal data is corrected if you believe it is incorrect, incomplete or inaccurate;
- request that we erase your personal data in the following circumstances:
  - if we are continuing to process personal data beyond the period when it is necessary to do so for the purpose for which it was originally collected;
  - if we are relying on consent as the legal basis for processing and you withdraw consent;

- if we are relying on legitimate interest as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing;
- if the personal data has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation);
- if it is necessary to delete the personal data to comply with a legal obligation;
- ask us to restrict our data processing activities where you consider that:
  - personal data is inaccurate;
  - our processing of your personal data is unlawful ;
  - where we no longer need the personal data but you require us to keep it to enable you to establish, exercise or defend a legal claim;
  - where you have raised an objection to our use of your personal data;
- request a copy of certain personal data that you have provided to us in a commonly used electronic format. This right relates to personal data that you have provided to us that we need in order to perform our agreement with you and personal data where we are relying on consent to process your personal data;
- object to our processing of your personal data where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal data;
- not be subject to automated decisions which produce legal effects or which could have a similarly significant effect on you.

If you would like to exercise any of your rights or find out more, please contact [dataprotection@chblondon.com](mailto:dataprotection@chblondon.com).

### ***Lodging A Complaint***

If you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you may contact us at [dataprotection@chblondon.com](mailto:dataprotection@chblondon.com), call us on 0207 600 6600 or write to us at the above address. You also have the right to lodge a complaint with the supervisory authority the Information Commissioner's Officer (*tel: 03031231113*) or visit their website <https://ico.org.uk/concerns/>.

The Bank may update this Privacy Statement from time to time. If we make material changes to the statement, we will notify you of these changes. This Privacy statement was updated in April 2021.