



Standard Advisory London Limited Third Party Privacy Statement

Purpose of this Privacy Notice

Standard Advisory London Limited ("**SALL**" or "**we**") recognises its obligations to process personal data in accordance with all relevant laws. This notice sets out how we will hold and use your personal data.

Where you provide SALL with personal data relating to any other person (for example, a company director), you represent that this information is accurate, that you have the consent of that person to provide the information to us and that you will provide that person with the current version of this privacy notice.

We need to collect, process, use, share and store personal data about you in order to perform any agreement we have with you and meet our legal and regulatory obligations. It also explains how we share personal data with our parent company, Standard Bank Group Limited, and its subsidiaries (together the "**SB Group**").

Data Protection Principles

We will comply with data protection law in relation to your personal data. Your personal data means any information relating to you as an individual.

Data protection law says that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.



- Kept securely.

Sources and types of Personal Data

We may obtain personal data about you where you provide this to us or we obtain it from third parties. These third parties may include employers, joint account holders and credit reference and fraud prevention agencies. Personal data may also come from your dealings with the SB Group or third parties and may include information learned from performing an agreement with you.

Depending on the nature and means of any enquiry you make to us and the types of product and service you are interested in or that the SB Group provides to you, we will typically collect and use the following personal data:

- your name, gender, date and place of birth, occupation and income, employment history, marital status and dependents;
- your contact information: your name (and any previous names), your home and/or business address, your telephone numbers, your e-mail addresses and any other contact information we reasonably require;
- your signature and any information you provide as part of our verification procedures;
- identification documentation (including passport, proof of address etc), information on the source of income and/or wealth;
- other information required for account approvals, sanctions compliance and regulatory compliance including information about bank accounts, financial and tax information;
- photographs or other visual images of you including from CCTV footage;
- records and recordings of telephone conversations with SB Group staff;
- transactional information relating to your accounts and dealings with you;
- other personal information about you relating to your enquiry and any products and services provided to you; and/or
- in certain situations we may collect and process “**special category / sensitive personal information**” in the form of information relating to offences (for sanctions and regulatory compliance) and information about any disabilities (for access to our premises for events etc).



Personal data about you may be obtained directly from you or other third parties including during our on-boarding process and/or clients, customers or suppliers with which you are connected. We may also collect personal data about you from third parties and publicly available sources, such as credit reporting and government agencies where it is lawful for us to do so. All such personal data may be updated or amended during the course of your relationship with the SB Group.

We will at all times process your personal data in accordance with all relevant laws.

We may use your personal data to:

- provide you with the services and transactions that you request;
- manage our relationship with you;
- verify your identity and carry out "know your customer" checks;
- meet our legal and compliance obligations including our obligations under applicable anti-money laundering, sanctions, anti-bribery and tax laws;
- perform credit checks and obtain references in order to provide you with services and meet our compliance obligations;
- perform any contract for delivery of services for your benefit by us or SB Group;
- enforce our rights and protect against harm to our property and interests and allow other members of the SB Group to do the same;
- prevent and detect crime, including fraud, money laundering and identity theft;
- carry out the management of the SB Group (including insurance, risk management, credit management and audit); and/or
- otherwise where it is necessary for the legitimate interests of the SB Group (or those of a third party) and your interests and fundamental rights do not override those interests.

Your personal data may be used in internal reports and minutes where we are entitled to process it in accordance with law.

We may use your personal data for marketing purposes where we have your consent or where permitted by law.



We may use your personal data to undertake searches against sanctions lists maintained by the United Kingdom, the European Union (EU) or any other member of the EU, the United States government or any other government, including those lists maintained by the United Kingdom Treasury and the United States Office of Foreign Assets Control.

We may also use your personal data:

- where the law requires us to do so;
- where we need to protect your interests (or someone else's interests); or
- where it is needed in the public interest.

Disclosure of Your Personal Data

We may disclose your personal data to:

- other members of the SB Group (who will apply an equivalent standard of protection) where this is in accordance with this notice and law (see <http://www.standardbank.com/pages/StandardBankGroup/web/docs/Oursubs2017.pdf> for our different Standard Bank offices and their locations including the USA and South Africa);
- service providers to and agents of the SB Group (on appropriate terms that apply an adequate level of protection);
- regulatory, tax, law enforcement and other governmental authorities;
- your advisers and others acting for you (including payment recipients, beneficiaries, account nominees, intermediaries, correspondent and agent banks, clearing houses and clearing or settlement systems);
- anyone you authorise to give instructions or to use services on your behalf;
- other trusted third parties that we work with to provide you with our products and services or meet your requests;
- fraud prevention agencies, credit reference agencies and debt recovery agents; and
- third parties in connection with a reorganisation, sale or acquisition of any part of the SB Group business.



We may also disclose your personal data for marketing purposes where we have your consent to do so.

If you provide us with personal data about any other person (such as your dependents or a joint account holder) you confirm that you have their consent to do this (or are otherwise allowed to provide the information to us in accordance with applicable data protection laws) and for us to use it in accordance with this notice.

We may monitor and record communications with you including telephone calls and use this data to check instructions, review our services and for training and quality purposes.

We may use CCTV in and around our premises for security. These systems may monitor and collect images or recordings of you.

Marketing by electronic means

We may use your personal data for marketing where we are permitted by law, including where we have your consent. Where we have your consent to use your personal data for marketing we will comply with all terms of that consent and any “opt-out” relating to it.

You always have the right to opt-out of receiving marketing communications at any time by following the instructions on the communication itself or through our customer service channels.

International Transfers

We may transfer your personal data to countries outside the European Economic Area provided that we do so in accordance with applicable law and on terms that ensure an adequate level of protection.

If we provide any of your personal data to any person outside the UK we will where possible do so on terms that require that they apply equivalent levels of protection to those that we apply. In other situations (for example where we are required by law to disclose information) we will only do so in accordance with law.



Storage and Retention of Personal Data

If you or we close your account or end our relationship or if you decide not to go ahead with or we decline your application for a product or service we will keep your information in accordance with our information risk and document retention policies for the period allowed by law. This will include where permitted for our legitimate business purposes, to help prevent crime and for other legal and regulatory reasons.

Our electronic systems and databases are used to process and store your personal information for the purposes of administering our relationships and related activities. All such systems and databases only collect, receive, use and share your personal information in accordance with, and as permitted by applicable laws, and/or internal business policies, standards, processes and procedures applicable to SALL.

Where personal information is retained in hard copy (paper) format it is kept secure and safe in secure access storage either onsite at our offices or at outside locations with duly vetted and reputable safe storage organisations.

Your Rights in Respect of Your Personal Data

If you have any questions about this privacy notice, how we handle your personal data or if you wish to exercise any of your legal rights or other rights under this privacy notice, please contact dataprotection@standardsbg.com.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can find out more about your rights in relation to your personal data at www.ico.org.uk.

You have rights to obtain a copy of your personal data and in certain situations to obtain correction, erasure and restriction of processing of your personal data. You have a right of data portability.

Where processing is based on your consent you have a right to withdraw this at any time. You can ask us to stop or start sending you marketing messages at any time by contacting us at dataprotection@standardsbg.com.

Changes to this Privacy Notice



We may change this notice from time to time. Where we make material changes we will notify these to you. All updates will be published at

<https://corporateandinvestment.standardbank.com/CIB/Country-profiles/Europe-&-Asia-Pacific/United-Kingdom>.

Please check this address regularly.

Contact

Any queries or concerns about this Privacy Statement should please be made in writing and addressed to dataprivacy@standardsbg.com whose contact details are set out in this Privacy Statement.