



Bank of Beirut (UK) Ltd: Privacy Notice

Bank of Beirut (UK) Ltd – company number 04406777 - at the registered office 66 Cannon Street, London, United Kingdom, EC4N 6A is the data controller for the purposes of this notice.

The following sections explain how and for what purposes Bank of Beirut (UK) Ltd (referred to as “we”, “us” or “our”) will use your personal information.

“you” relates to any person whose personal data is processed by us.

This is our Privacy Notice (“The Notice”) which explains how we obtain, use and keep your personal data safe, what information we’ll collect about you and who we’ll share your information with. The Notice continues to apply even after the contract for banking with us ends to ensure compliance with other banking laws and regulatory requirements.

This Privacy Notice may be updated from time to time. For the most recent version of this document, please visit our website at www.bankofbeirut.co.uk

What Personal Information Do We Collect?

When an Application Form is submitted by an organisation (“the Company”) or by you to use any of our products or services we will collect and hold personal and financial information about you (as set out in the Application Form) and may obtain or receive such information about you in the future. The information we process about you will be obtained from various sources including:

- Directly from you
- From the Company
- From the operation of the Account and any account(s) and service(s) separately provided to you by us, including account transactions
- From our parent company/third parties who are companies and organisations which we may be partnered with who may have introduced you to us
- From other organisations including credit reference and fraud prevention agencies; and
- from other persons who know you including joint account holders and persons with whom you are financially linked in the context of a particular product
- From legal representatives and other individuals authorised to act on your behalf

We may link information concerning your accounts with us to information relating to products and services we provide to you.

The Information We Process

We collect and process various categories of personal information at the commencement of and during your relationship with us. To prevent and detect fraud, money laundering and other crimes (such as identity theft), we use closed circuit television (CCTV) in and around our premises to monitor and collect images. In all cases, we seek to limit the collection and processing of data to what is necessary.

Personal Information may Include:

- Basic personal information, including full name and address, date of birth, country of birth, nationality, passport number, and other relevant contact details (phone/mobile number, email address)
- Financial information, including account numbers, transactional information and history
- Information about your family, lifestyle and social circumstances (such as dependents, marital status, next of kin)
- Information about your financial circumstances, including personal wealth, assets and liabilities, proof of income and expenditure, credit and borrowing history and needs and goals
- Education and employment information
- Goods and services provided
- Requests, queries and complaints
- Visual images and personal appearance (such as copy of passports or CCTV images); and

where permitted by law, we may process information about criminal convictions or offences and alleged offences for specific and limited activities and purposes, such as to perform checks to prevent and detect crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions. This may involve investigating and gathering intelligence on suspected financial crimes, fraud and threats and sharing data between banks and with law enforcement and regulatory bodies.

How Do We Use Your Personal Information?

We hold and process your personal data including sensitive personal data where we need to for the purposes of the product or services we provide to you (for example, trade finance, foreign exchange services, online banking services, current and deposit accounts, loans and mortgages) or where it is in our normal course of business to do so. This includes the following purposes:

- To make credit decisions about you and anyone to whom you are linked financially or other members of your household (which may involve credit scoring - further details below on this)
- Managing credit and credit-related facilities
- Fulfilling a transaction or in the provision of a service
- To consider and implement business, product and technology developments
- To undertake statistical analysis, financial risk assessment, anti-money laundering checks (which may include telephoning you), compliance and regulatory reporting, fraud prevention and recovering debt
- To help us identify products and services which may be of interest to the Company and/or you (unless you have asked us not to)
- Systems testing and development; and/or
- where necessary to comply with our legal and regulatory obligations, court orders, regulatory, tax and law enforcement agency requests in the UK and elsewhere and for wider corporate governance and compliance purposes as are relevant to our operations in the UK and elsewhere including requests by overseas regulators, tax and law enforcement agencies.

Who Do We Share Your Personal Information with?

We will disclose information outside our group of companies only to the following parties:

Credit Reference Agencies

We may disclose your information to licensed credit reference agencies to help make financial decisions for you and anyone with whom you are linked financially or other members of your household. Our enquiries or searches may be recorded. Credit reference agencies may supply us with financial information.

Please note, if you make several credit applications within a short time, this may temporarily affect your ability to obtain credit.

When credit reference agencies receive a search from us they will place a search footprint on your credit file that may be seen by other lenders and other companies unrelated to us. These search footprints, personal data and (possibly) account performance data may be used by other lenders and credit reference agency customers. The credit reference agencies may add the details of our search and information we hold about you to their records relating to you. For more information regarding how Credit Reference Agencies manage their data <https://www.callcredit.co.uk/crain>.

A link between joint applicants and/or any individual identified as your financial partner (for example a spouse or financial associate with whom you have a personal relationship that creates a joint financial link in a similar way to a married couple, such as a person living at your address) will be created at credit reference agencies, which will link your financial records. You and anyone else with whom you have a financial link understand that each other's information may be taken into account in all future applications by either or both of you. We may link you both in our own records, take both your information into account in future applications by either or both of you, and continue this linking until for example one of you notifies us that you are no longer linked. This linking will continue until such time as you or the other relevant person successfully files a disassociation at the credit reference agencies. If your circumstances change such that you are no longer a financial unit with another person you should contact the credit reference agencies about this.

Credit searches and other information about you which is provided by us to the credit reference agencies may be used and disclosed by them to other companies unrelated to us for the purposes mentioned above and to enable those other companies to trace your whereabouts, recover debts that you owe and verify your identity. Records remain on file at the credit reference agencies for 6 years after they are closed, whether settled by you or defaulted.

We do not make judgments based on automated decision making.

Anti-Fraud Organisations

If false or inaccurate information is provided by you or on your behalf, if we suspect fraud or if fraud is identified, details will be kept in our records and also passed to fraud prevention agencies, law enforcement agencies and other organisations involved in crime and fraud prevention which may access and use this information. We and those other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- Checking details on applications for credit and credit related or other facilities
- Managing credit and debit related accounts or facilities
- Recovering debt
- Checking details on proposals and claims for all types of insurance
- Checking details of job applicants and employees

We or any other organisations may access and use from other countries the information recorded by fraud prevention agencies and credit reference agencies. If you would like details of the agencies from which we obtain and record information about you, please write to: FAO Data Protection Officer, Bank of Beirut (UK) Ltd, 66 Cannon Street, London EC4N 6AE.

You can contact the UK's credit reference agencies to find out what information they hold about you. The information they hold may not be the same, so you may wish to contact more than one. They are entitled to charge you a fee for the service.

Transfer of Personal Data

From time to time we will engage service providers which may include group companies, agents and subcontractors to provide services to us. They will have access to, and will process, your information on our behalf to provide such services.

Your personal data and sensitive personal data may be transferred to countries or territories outside the UK, including for example to our service providers, agents, subcontractors and to actual or prospective purchasers of our business or assets. In these cases, steps will be taken to ensure all the safety measures are adopted to protect your personal data.

Safeguards in Place to Protect your Personal Data

We may anonymise or scramble personal information in such a way as to ensure individuals cannot be identified from it. We may use anonymised/scrambled data for statistical analysis and administration including analysis of trends, to tailor our business and our service offerings, to conduct risk assessment and to analyse costs and charges. We may share anonymised/scrambled data with the third parties mentioned above.

Additional Safeguards for International Data Transfers

For international transfers to a third country where a 'data adequacy' status is not granted by the UK, we ensure that appropriate safeguards have been put in place in compliance with Art 46 of the UK GDPR.

Legal Obligations and The Processing of Your Data

On application for a product or service (and over the course of the duration of your relationship with us), we must collect and process personal information about you

It is important to note, if you do not provide us with the required information, we cannot operate your account and/or provide products and services to you

Processing is likely to Include:

- Confirmation of your identity
- Sharing data with police, law enforcement, tax authorities where legally required
- Investigate and resolution of complaints
- Undertake monitoring for the purpose of preventing and identifying crime
- To comply with laws and regulations
- we will share data with other banks to help recover funds that have entered your account as a result of a misdirected payment
- Communications including updates to product and service terms and conditions
- Analysis of customer data for the purposes of maintaining and improving data quality
- Investigate and report on incidents or emergencies on properties and premises

Contractual Obligation

- To consider and process applications for products or services
- The provision and administration of products and services for the duration of the relationship with us
- Communication relating to products and services you receive

Legal Obligation

- Confirmation of your identity

- The undertaking of continuous screening to aid the detection and prevention of crime
- To comply with all relevant laws for example relating to money laundering, fraud, terrorist financing, bribery and corruption
- Share data with regulatory authorities
- Mandatory communications

Other Lawful Basis of processing

We may process your information without prejudicing your interests or fundamental rights and freedoms for the following reasons:

- To assess and process applications for products or services
- In the course of the administration of products and services throughout your relationship with us
- Electronic communications sent to us and telephone conversations with us may be monitored and/or recorded for training purposes, internal investigations, legal reasons, to check instructions, or to meet regulatory requirements
- Maintenance of our relationship with you and for customer service
- To facilitate the day-to-day running of our business
- Ensure business continuity and disaster recovery and responding to information technology and business incidents and emergencies
- To safeguard network and information security
- For the provision and investigation of our material risks
- Perform general, financial and regulatory accounting and reporting
- Protect our legal rights and interests
- Manage and monitor our properties

It is our interest to ensure that we provide you with the most appropriate products and services. This may require:

- Analysing customer behaviour and history
- Analysing customer complaints
- Monitoring the performance of products and services

It is in our interest to manage our risk and to determine the products and services we can offer and to protect our business from financial crime. This may require us to:

- Carry out financial, credit and insurance risk assessments
- Manage and take decisions about your accounts
- Complete screening (in addition to statutory requirements) on our customers, potential customers, and associated persons

Marketing

We may contact you by post, phone, email or SMS text, or other means as may become relevant from time to time, to inform you about products and services which may be of interest to you and which are supplied by any part of our group of companies or by carefully selected third parties. We may with your consent, and subject to the completion of a Legitimate Interest Assessment (LIA) if required, share your personal data with those carefully selected third parties so that they can contact you directly.

You can inform us at any time if you do not want to receive marketing information from us or our subsidiaries. To do this, contact us at Bank of Beirut (UK) Ltd – Head Office 66 Cannon Street, London EC4N 6AE. To do this in respect of the third parties you would need to contact them directly. The sender of the marketing and details of how to unsubscribe will be identified in the communication itself.

When we your and any related parties' personal data to meet our legitimate interests, we put in place safeguards to ensure privacy is protected and to ensure that our legitimate interests do not override your and any related parties' interests and fundamental rights.

Cookies

Bank of Beirut (UK) Ltd uses cookies on its website for a number of purposes, such as allowing individuals to navigate between pages effectively, remembering individual's preferences and generally improving their online experience. For more information visit our cookie policy on our website.

Your Rights

You are entitled to a copy of the personal information we hold about you. To do this, contact us in writing at Bank of Beirut (UK) Ltd – Head Office 66 Cannon Street, London EC4N 6AE. For further information on your rights under the UK GDPR, you can contact: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or visit <https://ico.org.uk/>

We may record and/or monitor telephone calls to enhance security, to help address complaints, improve our customer service, for staff training purposes, as required for compliance with regulatory rules, to prevent or detect crime or any unauthorised use of our telephone systems, and to evidence instructions received by telephone (in each case to the extent the same is in permitted by applicable laws and regulations).

Your Right to Lodge a Complaint

If you are concerned about how your personal data is used or processed by us, you have the right to formally to lodge a complaint directly with Bank of Beirut (UK) Ltd. This is a prerequisite for submitting a complaint to the ICO

We encourage you to contact us first so we can promptly address your concerns.

To lodge a formal complaint regarding data protection, please contact us at FAO Data Protection Officer, Bank of Beirut (UK) Ltd, 66 Cannon Street, London EC4N 6AE.

Upon receipt of your data protection complaint, we will follow a robust procedure, which includes:

- **Acknowledgement and Investigation:** we will acknowledge your request in writing within 3 business days and conduct a thorough investigation into your concerns, ensuring the matter is resolved without undue delay and no later than 30 calendar days of receipt of request and verified ID.
Should complex circumstances prevent resolution within this period, the Bank will inform the complainant in writing of the extended timeline, which shall not exceed a further 60 calendar days, and provide reasons for the delay
- **Record Keeping:** We will keep a record of the complaint in our GDPR registers in line with regulatory and legal requirements.

We need the information we hold about you to be accurate and up to date. Please help us by informing us promptly of any changes to your personal circumstances or details.

If you remain dissatisfied with our response or the way we have handled your data protection complaint, you have the right to lodge a formal complaint with the Information Commissioner's Office <https://ico.org.uk/>

Record Keeping – Storage Limitation

We will hold your personal data for no longer than is necessary for the purposes for which the personal data is processed, in accordance with principle 5 (i) (e) Storage Limitation of UK GDPR. However, personal data may be stored for longer in certain circumstances such as to meet regulatory or legal requirements or to defend a claim.

Your Rights - Summary

Informed	You have a right to be informed on how the data that has been collected, on how it is going to be used, for how long it will be kept and whether it is going to be shared with any third parties
Access	<p>You have a right to get access to the data we hold about you. There is no charge for access to your personal data. To obtain a copy of the personal information we hold about you, please write to: at FAO Data Protection Officer Bank of Beirut (UK) Ltd, 66 Cannon Street, London EC4N 6AE</p> <p>The request must be reasonable and proportionate, and should be framed to avoid placing an undue burden on the bank by requiring exhaustive searches for all personal data searches</p> <p>In order for us to provide you with the right information, you will need to provide a proof of your identity. We aim to process your request within 30 calendar days upon receipt of your request. This time limit can be paused while we await necessary information (e.g. identity verification or clarification of the request scope)</p>
Rectification	You have a right to rectification of erroneous personal information and to update incomplete personal information. Additionally, you have the right to request that data processing be restricted. Importantly if you request us to restrict processing your information, we may have to suspend the operation of your account.
Erasure	<p>You have a right to request that we delete your personal information. If:</p> <ul style="list-style-type: none">• we no longer need to process your information for the purposes for which it was provided• we have requested your permission to process your personal information, and you wish to withdraw your consent; or• we are not using your information in a lawful manner. <p>Importantly if you request us to restrict processing your information, we may have to suspend the operation of your account</p>
Restriction	You have a right to request us to restrict the processing of your personal information if: <ul style="list-style-type: none">• any of the information that we hold about you is inaccurate• we no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims or• we are not using your information in a lawful manner
Portability	<p>You have a right to data portability. You have a right to receive the personal information you provided to us in a portable format</p> <p>Importantly, if you request us to restrict processing your information, we may have to suspend the operation of your account</p>

Objection	You have a right to object in certain circumstances, such as direct marketing etc.
Lodge a Complaint	<p>You have a right to lodge a complaint directly with Bank of Beirut (UK) Ltd, in compliance with the Data Use and Access Act 2025</p> <p>This includes, but is not limited to, complaints concerning:</p> <ul style="list-style-type: none"> • Refusal or delay in fulfilling a Data Subject Access request (DSAR), or Data Correction Request • The accuracy, completeness, or integrity of Personal Data held by the Bank • The Bank's adherence to the data sharing, use, or consent provisions of the DUUA 2025 • Suspected unauthorised access or a Data Security breach affecting the Data Subject's information • Dissatisfaction with the Bank's procedures for ensuring data portability
Automated Decision	We do not make judgments based on automated decision making.