

# ADIB (UK) Limited Privacy Notice



ADIB UK - Privacy Notice V1 May 2018

 | [adib.ae](http://adib.ae) UAE  | +971 2 412 9000 — UK  | +44 20 7590 2200 —  | +44 20 7590 2211

ADIB (UK) Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority with Firm Reference Number 562094.

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ADIB (UK) Limited gathers and processes your personal information in accordance with this Privacy Notice and in compliance with the GDPR and UK data Protection law. 'Personal information' refers to information about a living individual who can be identified from that information (either by itself or when it is combined with other information).

The purpose of this Privacy Notice is to provide you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

We reserve the right to change this Privacy Notice. Any updates to this Privacy Notice will be communicated to you and published on our website.

## 1. Who we are

- 1.1 This privacy notice ('Privacy Notice') applies to all personal information processing activities carried out by ADIB UK Limited ('ADIB UK' or 'we' or 'us' or 'our').
- 1.2 ADIB UK is limited company registered in England and Wales under company number 07327879.
- 1.3 ADIB UK is registered on the Information Commissioner's Office Register under registration number Z314475X.
- 1.4 ADIB UK is a data controller in respect of personal information that we process in connection with our business (including the products and services that we provide).
- 1.5 Our main place of business ('Branch') is One Hyde Park, 100 Knightsbridge, London SW1X 7L J.
- 1.6 Our registered office is 26-28 Hammersmith Grove, London W6 7HA.
- 1.7 ADIB UK is a subsidiary of the Abu Dhabi Islamic Bank PJSC (UAE).

## 2. Personal information we process

- 2.1 We collect and process various categories of personal information at the commencement of, and for the duration of, your relationship with us. We will only collect and process personal information which is necessary to achieve one or more of legitimate purposes as identified in Annex A of this Privacy Notice.
- 2.2 You are not obligated to provide your personal information to ADIB UK, however, as this information is required for us to provide you with our products and services, if you do not provide personal information/agree to the way we process your information, it may not be possible for us to continue to operate your account and/or provide certain products and services to you. Please note that your objection to receiving marketing communications does not have any impact on the products and services provided/available to you.
- 2.3 Personal information we collect and process may include:
  - a. Basic personal information, including your name, maiden name, mother's maiden name, address, date of birth, contact details, passport number and driving license number;

- b. Information about your family and lifestyle/social circumstances such as your marital status, and your dependents;
  - c. Information about your education and employment
  - d. Information, and where necessary proof, for e.g. bank statements for accounts you hold with other organisations, about your financial circumstances, including personal wealth, income and expenditure, assets and liabilities, credit/borrowing history and your needs and goals;
  - e. Financial information, including your tax identification number, country of tax residence, account transactional information and history and your relationship with other banks;
  - f. Information about products and services provided to you;
  - g. Visual images and personal appearance including copies of passports and other photographic identification documents and CCTV images; and
  - h. Profile information and activity, based on your interaction with us and your activity on our website including for example Internet Protocol (IP) address and site visits
- 2.4 We will only process special categories of information for specific and limited purposes, such as providing services to you and detecting and preventing financial crime, where we are lawfully permitted to do so, and in accordance Annex A, or where we have obtained your explicit consent. Where we process the information based on your consent you may withdraw your consent at any time by emailing [UKDataProtection@adib.com](mailto:UKDataProtection@adib.com). We will act on your withdrawal immediately, unless there is a legitimate or legal reason for not doing so.
- 2.5 Special categories of information which we may process may include information about your:
- a. Racial or ethnic origin,
  - b. Religious or philosophical beliefs; and
  - c. Biometric information, relating to the physical, physiological or behavioral characteristics of a person, including, for example, using voice recognition or similar technologies to help us prevent fraud and money laundering.
- 2.6 Where lawfully permitted, we may process information about criminal convictions or offences and alleged offences for limited and specific activities and purposes including conducting investigations to detect and prevent criminal activities and to comply with laws relating to money laundering, terrorist financing, international sanctions, fraud and bribery and corruption. Our investigations may involve gathering intelligence on suspected financial crimes, fraud and threats and sharing data between banks and with regulatory and law enforcement bodies.
- 2.7 In the event that we change the way we process your personal information, and where we reasonably believe that you would not reasonable foresee/expect such a change, we will provide you with 30 days advance written notice to provide you with time to raise an objection. Please note however that in some circumstances an objection may prevent us from continuing with the relationship with you and/or provide some products and services to you.

### **3. How we collect/obtain personal information**

- 3.1 Your personal information is made up of all the personal and financial information we collect and hold about you and your transactions and your business and its officers and beneficial owners
- 3.2 We may collect obtain personal information as follows:

- a. Information provided by you, for e.g. on application forms and your communications with us;
- b. Information that we learn about you during our relationship and transactional activity on your account;
- c. Information that we gather from technology which you use to access our services such as location and usage data from an IP address when you visit our website and location data from a telephone number;
- d. Information that we collate from publicly available sources, company registers, media, online search engines and electoral registers; and
- e. Information that we receive from third parties – such as the ADIB Group and third parties who provide services to you or us, credit reference, fraud prevention and other government agencies, and (where legally permitted) other banks;

#### 4. Your rights

- 4.1 We have set out your rights in relation to the personal information we process about you in the table below to ensure that you are fully aware of your rights and the circumstances in which they apply.
- 4.2 If you wish to exercise any of these rights, have queries about how we use your personal information or if you wish to make a complaint, please contact our Privacy Officer at [UKDataProtection@adib.com](mailto:UKDataProtection@adib.com).
- 4.3 If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

RIGHTS	DETAILS
<b>Access</b>	<ul style="list-style-type: none"> <li>▪ The right to access personal information we hold about you</li> <li>▪ For details on how to submit a request, please refer to our 'Making a Subject Access Request' document on our website</li> </ul>
<b>Portability</b>	<ul style="list-style-type: none"> <li>▪ The right to request personal information, which you provided to us, in a portable format and to request that we send it directly to a third party, if technically feasible.</li> </ul>
<b>Restriction</b>	<ul style="list-style-type: none"> <li>▪ The right to request us to restrict the processing of your personal information if you believe that any of the information that we hold about you is inaccurate or 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.</li> </ul> <p>Note: If you request us to restrict processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you until the restriction is lifted.</p>

RIGHTS	DETAILS
<b>Rectification</b>	<ul style="list-style-type: none"> <li>▪ The right to request that we restrict processing and rectify inaccurate and/or incomplete personal information</li> </ul> <p>Note: If you request us to restrict processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you until the restriction is lifted.</p>
<b>Erasure</b>	<ul style="list-style-type: none"> <li>▪ The right to request that we erase your personal information if you believe that we no longer need to process your information for the purposes for which it was provided or 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.</li> </ul>
<b>Objection</b>	<ul style="list-style-type: none"> <li>▪ The right to object to processing of your personal information for the purposes described in Annex A.3, unless we can demonstrate compelling and legitimate grounds for processing.</li> </ul> <p>Note: If you request us to restrict processing your information, we may have to suspend the operation of your account and/or the products and services.</p>
<b>Withdraw consent</b>	<ul style="list-style-type: none"> <li>▪ Where we rely on your consent to process your personal information, for example for marketing purposes, you have a right to withdraw your consent at any time.</li> </ul>
<b>Complain</b>	<ul style="list-style-type: none"> <li>▪ The right to make a complaint about how we have processed your personal information</li> <li>▪ Complaints should be submitted to the Privacy Officer at <a href="mailto:UKDataProtection@adib.com">UKDataProtection@adib.com</a> who will aim to promptly investigate and resolve the matter.</li> <li>▪ You also have the right to lodge a complaint directly with the Supervisory Authority, details of which are below:</li> </ul> <p>Information Commissioner's Office  Wycliffe House  Water Lane  Wilmslow  SK9 5AF  0303 123 1113</p>

## 5. Sharing with third parties

- 5.1 We will only use and share your information where it is necessary for us to lawfully carry out our business activities. Your information may be shared with and processed by Abu Dhabi Islamic Bank PJSC (UAE).
- 5.2 We will not share your information with any other party except:
- a. Where we have your explicit consent;
  - b. Where required for your product or service;
  - c. Where we required to do so by law and/or regulations. In these circumstances the information may be shared with regulators, law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies around the world;
  - d. Where lawfully permitted, with other banks and third parties to help recover funds that have entered your account as a result of a misdirected payment by such a third party and, with your agreement, to help trace funds where you are a victim of suspected financial crime or where we suspect funds have entered your account as a result of a financial crime;
  - e. With correspondent banks, and agents and sub-contractors acting on our behalf, such as the companies which produce our cheque books and external auditors;
  - f. With credit reference and fraud prevention agencies;
  - g. Where permitted by law, it is necessary for our legitimate interests or those of a third party, and it is not inconsistent with the purposes listed above.
- 5.3 In the event that any additional authorised users are added to your account, we may share information about the use of the account by any authorised user with all other authorised users.
- 5.4 We will not share your information with third parties for marketing purposes without your explicit consent.

## 6. Transferring information overseas

- 6.1 Your personal information is stored on servers which are hosted at Abu Dhabi Islamic Bank PJSC (UAE). This information is transferred on the basis that Abu Dhabi Islamic Bank PJSC (UAE) protects your personal information in accordance with applicable laws and in the same way we would.
- 6.2 We may transfer your information to organisations in other countries on the basis that the recipient will protect your personal information in accordance with applicable laws and in the same way we would.
- 6.3 Where we transfer information to countries outside of the European Economic, including to Abu Dhabi Islamic Bank PJSC (UAE), we will only do so where:
- a. The European Commission has determined that the recipient country/organisation will protect your information adequately;
  - b. We have entered into a contract (which includes terms approved by the European Commission) with the recipient organisation to ensure your information is adequately protected. A copy of the relevant data protection clauses can be obtained by emailing [UKDataProtection@adib.com](mailto:UKDataProtection@adib.com).

## 7. Communications about your account

- 7.1 We will contact you about the operation and maintenance of your account (including updated information about how we process your personal information), either by email, post and/or telephone.
- 7.2 We will monitor and/or record calls, emails, letters or other communications in accordance with applicable laws for the purposes outlined in Annex A.
- 7.3 It is your responsibility to promptly notify us of any change in your contact details.

## 8. Marketing information

- 8.1 We will only send you marketing material, relating to products and/or services provided by us which we believe may be of interest to you, where you have given us explicit consent to do so.
- 8.2 You can withdraw your consent to receive marketing material at any time by emailing [UKDataProtection@adib.com](mailto:UKDataProtection@adib.com).

## 9. Credit reference and fraud prevention agencies

- 9.1 When you open your account with us, and periodically throughout the course of the relationship, we may access and use information from credit reference and fraud prevention agencies to:
- Check and verify your identity and the information you provide to us;
  - Prevent criminal activity including fraud and money laundering;
  - Manage and make decisions about your accounts, including assessing your creditworthiness; and
  - Recover debts.
- 9.2 We will not make decisions based solely on automated checks of information from credit reference and fraud prevention agencies and internal records.
- 9.3 For credit applications from UAE residents we use the Etihad Credit Bureau for credit reference checks. For credit applications from UK residents we will use one of the key credit reference agencies listed below.

CREDIT REFERENCE AGENCY	CONTACT DETAILS
Callcredit Limited	<p><b>Post:</b> Callcredit Information Group, One Park Lane, Leeds, West Yorkshire, LS3 1EP.</p> <p><b>Web Address:</b> <a href="http://www.callcredit.co.uk/consumer-solutions/contact-us">http://www.callcredit.co.uk/consumer-solutions/contact-us</a></p> <p><b>Email:</b> <a href="mailto:consumer@callcreditgroup.com">consumer@callcreditgroup.com</a></p> <p><b>Phone:</b> 0330 024 7574</p>

CREDIT REFERENCE AGENCY	CONTACT DETAILS
<p><b>Equifax Limited</b></p>	<p><b>Post:</b> Equifax Ltd, Customer Service Centre, PO Box 10036, Leicester, LE3 4FS.  <b>Web Address:</b> <a href="https://www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions.html">https://www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions.html</a>  <b>Email:</b> <a href="http://www.equifax.co.uk/ask">www.equifax.co.uk/ask</a>  <b>Phone:</b> 0333 321 4043 or 0800 014 2955</p>
<p><b>Experian Limited</b></p>	<p><b>Post:</b> Experian, PO BOX 9000, Nottingham, NG80 7WF  <b>Web Address:</b> <a href="http://www.experian.co.uk/consumer/contact-us/index.html">http://www.experian.co.uk/consumer/contact-us/index.html</a>  <b>Email:</b> <a href="mailto:consumer.helpservice@uk.experian.com">consumer.helpservice@uk.experian.com</a>  <b>Phone:</b> 0344 481 0800 or 0800 013 8888</p>

- 9.4 We use the information you provide us and credit reference agencies checks to assess your credit score and affordability, by reviewing your available net income and existing debts, which contribute to decision making on whether to give you credit. Information from credit reference agencies will show us details of your borrowing history and in particular your repayment history on any credit accounts, such as mortgages, loans, credit cards or overdrafts, and if you've had any court action such as judgments or bankruptcy.
- 9.5 If you provide false or inaccurate information and/or we identify or suspect fraud we will pass the details to fraud prevention agencies. This information can then be accessed by law enforcement agencies. Fraud prevention agencies may retain records for different periods of time, and if you are considered to pose a fraud/money laundering risk, they can hold your data for up to six years. This may result in others refusing to provide products, services, financing or employment to you.
- 9.6 If we, or a fraud prevention agency, determine that you pose a fraud/money laundering risk, we may stop providing products and services to you and terminate the relationship.

## 10. How long we keep your information

- 10.1 Through the course of our relationship and the provision of products or services, we create physical and electronic records that contain your information, such as customer account records, transaction activity records, tax information records and lending/credit account records. The purpose of creating, and managing, records is to enable us to provide our products and services to you and to comply with legal and regulatory requirements.
- 10.2 We only ever retain personal information for as long as is necessary and we have strict review and retention processes in place to meet these obligations.
- 10.3 We determine record retention periods based on the type of record, the nature of the activity, product or service, the purpose for which it was collected/created and the applicable legal and/or regulatory requirements.

- 10.4 We normally keep customer account records for a minimum of 5 years from the date your relationship with us ends, whilst other records are retained for shorter periods, for example 90 days for CCTV records. Retention periods may be changed from time to time based on business or legal and regulatory requirements.
- 10.5 In some circumstances, we may retain your information for longer periods, for example due to an investigation and/or order for regulatory and law enforcement agencies.

## 11. Security

- 11.1 We take your privacy seriously and are committed to taking every reasonable measure and precaution to protect and secure your information. We work hard to protect your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including encryptions, firewalls, restricted access/clearance levels, training, policies & procedures, regular password changes and anti-virus/malware.

## Annex A: Purpose of Processing

ADIB UK takes your privacy very seriously and will only use and share your information where it is necessary for us to carry out our lawful business activities.

We process your personal information on 4 lawful bases:

1. Contractual Necessity
2. Legal Obligation
3. Legitimate Interest of the Bank
4. Consent

Please see below for details of how your personal information may be processed.

## 1. CONTRACTUAL NECESSITY

We may process your information where it is necessary to enter into a contract with you for the provision of our products or services or to perform our obligations under that contract.

This may include processing to:

- a. Assess and process account applications, including administering credit/financing facilities;
- b. Provide and deliver products and services throughout the relationship including:
  - opening, setting up or closing your accounts;
  - collecting and issuing all necessary documentation;
  - executing your instructions;
  - processing transactions and payments; and
  - resolving any queries or discrepancies and administering any changes.
- c. Communicate with you about your account(s) or the products and services you receive from us; and
- d. Manage and maintain our relationship with you and for ongoing customer service.

## 2. LEGAL OBLIGATION

We are legally required to collect and process certain personal information about you both at the beginning and throughout the duration of your relationship with us.

This may include processing to:

- a. Confirm and verify your identity;
- b. Assess suitability for financing applications, both at the time of the applications and throughout the duration of the relationship;
- c. Communicate with you in relation to updates to product and service terms and conditions;
- d. Investigate and resolve complaints;
- e. Perform checks and monitor transactions and location data for the purpose of detecting and preventing crime and to comply with laws relating to financial crime including money laundering, international sanctions, terrorist financing, fraud and bribery and corruption. This may involve processing information about criminal convictions and offences, investigating suspected financial crimes, fraud and threats and sharing data with other banks and law enforcement and regulatory bodies. This may involve sharing your information with Abu Dhabi Islamic Bank PJSC (UAE) – please refer to section 6 of this Privacy Notice for details of how we protect your personal information when we transfer data to Abu Dhabi Islamic Bank PJSC (UAE);
- f. Share data with other banks and third parties to help recover funds that have entered your account as a result of a misdirected payment by such a third party and, with your agreement, to help trace funds where you are a victim of suspected financial crime or where we suspect funds have entered your account as a result of a financial crime;
- g. Share data with law enforcement, tax authorities and other government and fraud prevention agencies. This includes reporting suspicious activity and responding to production and court orders;
- h. Conduct investigations in relation to our employees, for e.g. conduct breaches and breaches of our internal policies;
- i. Address litigation and regulatory investigations and other regulatory matters;
- j. Analyse data for the purposes of addressing issues and improving data quality;
- k. Provide assurance to law enforcement and regulatory bodies that we have implemented effective risk management and mitigation controls in relation to the risks we are exposed to;
- l. Address incidents/emergencies on the our premises; and
- m. Coordinate responses to disruptive incidents to ensure that we can continue to provide products and services to you.

### 3. LEGITIMATE INTERESTS OF ADIB UK

We may process your information where it is in our legitimate interests do so and without prejudicing your interests or fundamental rights and freedoms.

- a. It is within our legitimate interests to ensure that our processes and systems operate effectively and that we can continue operating as a business. We may process your information in the day-to-day running of our business, to manage our business and financial affairs and to protect our customers, employees and property. This may include processing your information to:
  - monitor, maintain and enhance internal business processes, communications solutions and services and information and data, technology;
  - ensure network and information security, prevent and detect criminal activity and protect your personal information. This may include monitoring access to our information technology, telecommunications systems and websites,
  - respond to information technology and business incidents and emergencies;
  - ensure business continuity and disaster recovery
  - Report and provide assurance on our risk management to internal management and regulatory and supervisory authorities;
  - conduct general, financial and regulatory accounting and reporting;
  - premises management and monitoring for the purpose of the detection and prevention of criminal activity, prosecution of offenders, identifying accidents/incidents and emergency situations; and
  - protect our legal rights and interests;
- b. It is within our legitimate interests to ensure that we provide you with appropriate products and services and to grow and improve as an organisation. This may require processing your information to enable us to:
  - monitor the performance and effectiveness of products and services;
  - assess the quality of our customer services and to provide staff training;
  - perform customer complaints analysis to identify issues, preventing future errors and mitigate negative impacts on customers;
  - compensate you for loss, inconvenience or distress as a result of services, process or regulatory failures;
  - identify and pursue new business opportunities;
  - assess our customers' actions, behaviors and transactional history in order to improve our products and services and develop new products and services
- c. It is within our legitimate interests to protect our business by detecting and preventing financial crime. It is also within our legitimate interests to manage the risks which we are exposed to, determine what products and services we offer and the terms of those products and services. This may include processing your information to:
  - carry out financial, credit and financial crime risk assessments;
  - conduct out checks (in addition to statutory requirements) on customers and potential customers and associated persons, including performing adverse media checks, screening

against external databases and sanctions lists and establishing connections to politically exposed persons;

- manage and take decisions about your accounts;
- share data with credit reference, fraud prevention and law enforcement agencies;
- recover debt; and
- conduct risk reporting and risk management.

#### 4. CONSENT

We may only process your information for marketing purposes where we have your explicit consent. You can withdraw your consent at any time by emailing [UKDataProtection@adib.com](mailto:UKDataProtection@adib.com)

This may require processing your information to enable us to:

- a. Assess which products and services may be of interest to you;
- b. Send you details of the products and services which we believe may be of interest to you. This may involve sharing your email address with Abu Dhabi Islamic Bank PJSC (UAE) in order to send the email to you – please refer to section 6 of this Privacy Notice for details of how we protect your personal information when we transfer data to Abu Dhabi Islamic Bank PJSC (UAE); and
- c. Communicate with you in relation to marketing material we may send you.

