

# First Commercial Bank London Branch

## Customer Privacy Notice

First Commercial Bank London Branch is committed to protecting your privacy and ensuring the highest level of security for your personal information. This Privacy Notice explains the types of personal information we collect, how we use that information, who we share it with, and how we protect that information.

### **Passing on this Privacy Notice**

Please also share this information with all persons to whom the content is also of interest. This applies, in particular, to authorised persons such as holders of a general commercial power of attorney, Directors, signatory, beneficial owners and contact persons. The same applies to potential jointly obligated parties, such as guarantors and other parties furnishing security.

Please read the following carefully to understand our views and practices regarding your personal information.

## 1. Who are we?

For the purposes of applicable data protection laws, the data controller is First Commercial Bank London Branch at 29 Wilson Street, London EC2M 2SJ, UK, Company registration number FC011028 in England & Wales.

## 2. What information is covered by this Privacy Notice?

This Privacy Notice covers all personal information processed by First Commercial Bank London Branch which means information that (either in isolation or in combination with other information) enables you to be identified directly or indirectly.

## 3. What information do we collect from you?

We may collect information about you from the following sources:

### 3.1 Information we receive from you

We may collect personal information (such as your name, postal and email address, previous addresses, telephone and fax number, occupation, assets, income, employment details, nationality, marital status and passport or other identification details) that you provide to us when you:

- submit applications to open an account; and
- subsequently correspond with us.

### 3.2 Information we collect about you

When you visit First Commercial Bank's website, we may use cookies and other technologies to automatically collect the following information:

- Technical information, including your IP address, your login information, browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times, and download errors;
- Information about your visit, including the websites you visit before and after our website and products you viewed or searched for; and
- Length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

## 4. How do we use your personal information?

We process the following information:	For the following purpose(s):	Based on the following justification:
Name, ID, address, other contact details, visa status, email, and phone number, etc.  (If you are under the age of 16 years old, we would get the consent given or authorized by the holder of parental responsibility over you before processing your personal data.)	To verify your identity.  To manage your account activity.  To enable FCB to contact customers.  To distribute your statements.  To meet all regulatory expectations.	Necessary to comply with legal and regulatory requirements to Know Your Customer.  Necessary to provide services to you  Necessary to fulfil our contract obligation

## 5. With which third parties do we share your personal information?

Your personal information is intended for First Commercial Bank London Branch but may be shared with third parties in certain circumstances:

**First Commercial Bank:** We may share your personal information within First Commercial Bank, including our parent company (First Financial Holding Company Limited) head office and branches, in order to open your account with us, administer our services and products, provide you with customer support, process your payments, understand your preferences, send you information about products and services that may be of interest to you and conduct the other activities described in this Privacy Notice.

**Our service providers:** We use other companies, agents or contractors to assist us with the provision of our services and products to you. We may share personal information with the following categories of service provider:

- infrastructure and IT service providers, including for email archiving.
- credit reference agencies.
- auditors and advisers.

In the course of providing such services, these service providers may have access to your personal information. However, we will only provide our service providers with personal information which is necessary for them to perform their services, and we require them not to use your information for any other purpose. We will use our best efforts to ensure that all our service providers keep your personal information secure.

**Third parties permitted by law:** In certain circumstances, we may be required to disclose or share your personal information in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, regulators, government agencies or to judicial or administrative authorities).

We may also disclose your personal information to third parties where disclosure is both legally permissible and necessary to protect or defend our rights, matters of national security, law enforcement, to enforce our contracts or protect your rights or those of the public.

**Third parties connected with business transfers:** We may transfer your personal information to third parties in connection with a reorganisation, restructuring, merger,

**acquisition or transfer of assets, provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Notice.**

We will not sell your personal information to third parties.

Please note our website may, from time to time, contain links to and from the websites of our partners or affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we have no control over how they may use your personal information. You should check the privacy policies of third party websites before you submit any personal information to them.

## 6. Do we transfer personal information outside the UK?

Your personal information may be transferred to and processed in Taiwan by our Head Office and our service providers. We will take all steps that are reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice as well as applicable data protection laws, including, where relevant, by entering into UK standard contractual clauses (or equivalent measures) with the party outside the UK.

## 7. What are your rights (All account holders are covered by the UK Data Protection Act 2018)?

If your data held in the UK, you have the following rights (if applicable):

- **Access.** You have the right to request a copy of the personal information we are processing about you. For your own privacy and security, at our discretion we may require you to prove your identity before providing the requested information.
- **Rectification.** You have the right to have incomplete or inaccurate personal information that we process about you rectified.
- **Deletion.** You have the right to request that we delete personal information that we process about you, except we are not obliged to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- **Restriction.** You have the right to restrict our processing of your personal information where you believe such data to be inaccurate; our processing is unlawful; or that we no longer need to process such data for a particular purpose unless we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.
- **Portability.** You have the right to obtain personal information we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) personal information which you have provided to us, and (b) if we are processing that data on the basis of your consent or to perform a contract with you.
- **Objection.** Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.
- **Withdrawing Consent.** If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge. This includes cases where you wish to opt out from marketing messages that you receive from us.

You can make a request to exercise any of these rights in relation to your personal information by sending the request by mail to **First Commercial Bank London Branch at 29 Wilson Street, London EC2M 2SJ, UK** or email to [j921a@firstbank.com.tw](mailto:j921a@firstbank.com.tw).

Please be advised that if you exercise the rights of Deletion, Restriction, Objection or Withdrawing Consent, we may not be able to continue our services to you if the necessary data is missed for processing.

You also have the right to lodge a complaint with the UK data protection authority if you believe that we have not complied with applicable data protection laws. If you are based in, or the issue relates to, the UK, the Information Commissioner's Office can be contacted as follows:

Telephone: +44 0303 123 1113  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)  
Website: [www.ico.org.uk](http://www.ico.org.uk)  
Web-form: [www.ico.org.uk/concerns/](http://www.ico.org.uk/concerns/)  
Address: Water Lane, Wycliffe House, Wilmslow, Cheshire, SK9 5AF

## 8. How do we protect your personal information?

We have implemented technical and organisational security measures to safeguard the personal information in our custody and control. Such measures include, for example, limiting access to personal information only to employees and authorised service providers who need to know such information for the purposes described in this Privacy Notice, as well as other administrative, technical and physical safeguards.

While we endeavour to protect our systems, sites, operations and information against unauthorised access, use, modification and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers.

## 9. How long do we keep your personal information?

We will only retain your personal data for as long as necessary for the purpose for which that data was collected and to the extent permitted by applicable laws. When we no longer need to use personal information, we will remove it from our systems and records and/or take steps to anonymise it so that you can no longer be identified from it.

## 10. How can you contact us?

If there are any questions or concerns regarding this Privacy Notice, please contact our Data Protection Officer as follows:

- by email: [i921a@firstbank.com.tw](mailto:i921a@firstbank.com.tw)
- by post: First Commercial Bank London Branch, 29 Wilson Street, London EC2M 2SJ, UK
- by phone: +44 20 74170000

## 11. Which version of this Privacy Notice applies?

This Privacy Notice is written in English and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail.

We reserve the right to change our Privacy Notice from time to time. If we decide to change our Privacy Notice, we will notify you of these changes in advance via email or by post.