



PERSIA INTERNATIONAL BANK PLC

Persia International Bank PLC (hence 'PIB') Data Protection Privacy Notice.

PIB is headquartered in London, UK with a branch established in Milan, Italy. The issuance of this document is a requirement under the following:

1. For the UK: – UK Data Protection Act 2018
2. For Italy: – EU Regulation 2016/79, referred to as the 'GDPR' and local implementing laws and regulations

The document has two parts:

Part 1 (from page 2 below): - Should be read and considered by those personal customers and other individuals dealing the PIB Head Office in London

Part 2 (from page 7 below): - Should be read and considered by those personal customers and other individuals dealing with the PIB branch office in Milan, Italy

Office Addresses

London

Head Office
6 Lothbury
London
EC2 7HH

Tele: 0207 606 8521

Milan Branch

Branch Office
Piazza della Repubblica 32
Milan -20124

Tele: 02 87325318

Part 1 – UK Data Protection Privacy Notice

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PRIVACY NOTICE

This notice is issued in accordance with UK regulations pertaining to data protection. Further it explains how your personal information may be held and used by Persia International Bank PLC ("PIB").

The information that we collect from you may derive from a number of sources as explained below.

1. INFORMATION WE MAY HOLD FROM YOU (PERSONAL DATA)

By "information" we mean the personal and financial information about you that we collect, use, share and store.

The information we collect will vary by customer and is dependant of the type of business you undertake with PIB and the relationship you have with us. All information collected will be retained safely, securely and confidentially.

The collected data may include some or all of the following:

- Personal details, e.g. name, previous names, gender, date and place of birth
- Contact details, e.g. address, email address, landline and mobile numbers
- Information concerning your identity e.g. photo ID, passport information, National Insurance number, National ID card and nationality
- Information we use to identify and authenticate you, e.g. your signature
- The contents of any correspondence you send us that has private information.
- Details of transfers to and from your accounts.

1.1 SENSITIVE PERSONAL DATA

Information that the data protection regulations deem to be of a sensitive personal nature ("Sensitive personal data") will only be collected from you if we have your express permission to do so. Examples of Sensitive personal data are :

- Race or ethnic origin
- Political opinions
- Religious beliefs
- Trade union membership
- Genetic data

2. INFORMATION WE MAY COLLECT OR GENERATE ABOUT YOU, FOR EXAMPLE:

- Information included in customer documentation,
- Investigations data, e.g. due diligence checks, sanctions and anti-money laundering checks, external intelligence reports
- Records of correspondence and other communications between us, including email, letters, telephone conversations etc

- Information that we need to support our regulatory obligations, e.g. information about transaction details, detection of any suspicious and unusual activity and information about parties connected to you or these activities
- Information from third party providers, e.g. credit reference / fraud prevention agencies etc
- Information obtained from you or third parties such as previous employers, joint account holders, credit reference agencies, or other organisations when you apply for an account with or other services we may provide.
- From public records

3. HOW WE WILL USE YOUR INFORMATION:

We'll only use your information where we have a lawful reason for using it.

These reasons include where we:

- Need to pursue our legitimate interests
- Need to process the information to establish and carry out an agreement (both initially and, where appropriate ongoing) we have with you,
- Need to process the information to comply with a legal, or regulatory obligation
- Believe the use of your information as described is in the public interest, e.g. for the purpose of preventing or detecting crime

4. OUR LEGAL AND REGULATORY OBLIGATIONS:

We will use the information we collect from you to meet our regulatory and legal obligations and to share with regulators and other authorities that Persia International Bank Plc are subject to (as requested by them).

We will only do this if required to comply with a legal / regulatory obligation, if it is in our legitimate interests and that of others, or to assist authorities in a specific ongoing investigation.

5. WHO WE MIGHT SHARE YOUR INFORMATION WITH:

We treat the information we hold about you as confidential, and will only share information with the following where there is a both a legal and legitimate reasons for doing so. The following are also required to keep personal information confidential, safe and secure:

- Law enforcement, government, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities
- Commercial partners who provide products, services and support to PIB
- UK and Overseas regulators / tax authorities / law enforcement agencies (as described in '4' above)
- Credit reference agencies
- Other parties involved in any disputes, including disputed transactions
- Fraud prevention agencies (e.g. Synectics) who'll also use it to detect and prevent fraud and other financial crime and to verify your identity;
- Anyone who provides instructions or operates any of your accounts on your behalf, e.g. Power of Attorney, solicitors, intermediaries, etc.
- Anybody else that we've been instructed to share your information with by either you, a joint account holder or anybody else who provides instructions or operates any of your accounts on your behalf.

6. HOW LONG WE'LL KEEP YOUR INFORMATION

We will keep your core banking data for a period of five years from the end of our relationship with you. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes

We may need to retain your information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes, e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc.

If we don't need to retain information for this period of time (but not less than 5 years), we may destroy, delete or anonymise it more promptly.

7. TRANSFERRING YOUR INFORMATION OVERSEAS

When the UK left the European Union (EU) on 31st December 2020, it transposed the GDPR (General Data Protection Regulations), which derive from EU regulation, into UK Law. This meant that there is little change in regulations under 'UK GDPR'

Your information may be transferred to and stored in locations outside the European Economic Area (EEA), including countries that may not have the same level of protection for personal information. In this case the Bank we take steps to ensure that any data sent is suitably protected.

We may need to transfer your information in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and/or for our legitimate interests.

We will only ever share your information with people who have the right to see it.

8. YOUR LEGAL RIGHTS

Your legal rights are set out below:

- 8.1 Right to Access** – you can request whether we hold information about you, how it is processed, and ask for copies of the any information held. This type of request is commonly referred to as a data subject access request
- 8.2 Right to Withdraw Consent** – at anytime you may withdraw your consent for the processing of information. However, if PIB need to continue the processing of your information for a legitimate reason then we will continue to do so, explaining our reasons in writing.
- 8.3 Right of Correction** – You may request that we rectify your personal information if it's inaccurate or incomplete. (It is important that you inform us updated if there are any changes to your personal information)
- 8.4 Right to be Forgotten** – You may request that your information be erased from our records (ie you become 'forgotten'). If PIB are entitled to retain your personal information, we will set out the reasons in writing to you,
- 8.5 Right of Restriction** – This is the right to object to, and to request that we restrict, our processing of your personal information, including for sales and marketing activities. In certain circumstances PIB may need to deny the request and, if this is the case, the reason will be confirmed to you in writing.

You can exercise your rights by contacting us using the contact details set out in section '10' below.

9. ASKING US FOR/UPDATING YOUR INFORMATION.

If you wish to update or amend any of the personal information that we currently hold, or if you wish to exercise any of the rights described above then, in the first instant, you should contact our customer services department at CusServicesDept@persiabank.co.uk

Before providing any information, we will ask for confirmation of your identity. PIB may also charge a reasonable fee to provide the information requested from us.

Any request for information made from us should be clear, so we can provide you with the details that you require. Further, the request should include the following details:

For example, tell us your:

- Full name(s)
- Address
- Date of birth
- Account number

Alternatively, you can contact in writing at the following address:

Customer Service Department,
Persia International Bank PLC,
6 Lothbury,
London,
EC2R 7HH

10. LODGING A COMPLAINT

If you are unhappy about the processing of your personal data or how we have handled your information, you may contact our data protection manager at the following address:

Data Protection Manager,
Persia International Bank PLC,
6 Lothbury,
London, EC2R 7HH

You may also wish to contact the Information Commissioners Office:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow
Cheshire, SK9 5AF

Part 2 – Milan Branch, GDPR Privacy Notice

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11. AMENDMENTS TO THIS NOTICE

In compliance with the provisions of EU Regulation no. 2016/679 (hereinafter referred to as the "**GDPR**"), Persia International Bank PLC - Italian branch, informs you that your personal data provided on your behalf (hereinafter referred to as the "Data **Subject**") by employees, collaborators, appointees and/or company representatives authorised to do so, and personal data relating to other natural and/or legal persons, collected in the context of the provision of services under the contract (the "**Contract**") signed by the Data Subject and PIB (as defined below), will be processed in the following manner and for the following purposes.

1 - Data controller

The data controller is Persia International Bank PLC (hereinafter referred to as "**PIB**", the "**Company**" and also the "Data **Controller**"), with registered office in London (UK), Lothbury EC2R 7HH 6, through its representative in Italy pursuant to art. 27 GDPR the branch office in Milan (MI), via Santa Maria Valle 3, REA MI-2587224, tax code and VAT registration number 11211890964, in the person of its legal representative Mr. Biagio Matranga (f.c. MTRBGI48R24Z326Y). Tel: 339-2380108, email: privacy@persiabank.co.uk.

2 - Object of processing

The processing shall concern single operations, or a set of processing operations (such as, by way of example: collection, recording, organisation, storage, processing, communication, modification, selection, use), the data provided by the Data Subject and the following personal data provided in the context of the performance of the services covered by the Contract (the '**Personal Data**' or also the '**Data**')

- **identification data** of the Data Subject and its employees including, inter alia, name, e-mail address, telephone number and registered office;
- **contact data** (including images), provided by the data subject at the pre-contractual and contractual stage;
- **personal data** required to sign the Contract and to fulfil legal obligations;
- **personal data** of the Interested Party or of Third Parties related to the Interested Party, other than the above, necessary for the performance of activities relating to the Contract;
- **economic and financial data of the data** subject or of third parties related to the data subject necessary for the assessment of the economic position of the data subject;
- **data of an insurance nature** of the Data Subject or of Third Parties related to the Data Subject necessary for the conclusion of the Contract and for the fulfilment of contractual obligations;
- **particular data** of the data subject or of third parties related to the data subject, necessary for the performance of the activities referred to in Legislative Decree 231/2007, as subsequently amended and supplemented.

3 - Purpose of processing

Personal Data are processed for the following purposes:

- (a) to verify and monitor the identity of participants in the activities covered by the Contract;
- (b) for communications and transmission of information material relating to the activities covered by the Contract;
- (c) for statistical and scientific purposes, including for the analysis and improvement of the activities provided within the Service, research and development;
- (d) comply with obligations laid down by law, regulation, EU legislation or an order of the Authority;
- (e) exercise the rights of the Controller, e.g. the right to exercise a right in court.

The processing of Data for the purposes sub d) does not require the consent of the Data Subject as it is necessary to fulfil legal obligations or for the performance of relations to which the Data Subject is a party, pursuant to Article 6(1)(b) and (c) of the GDPR.

The processing of Data for the purpose under e) does not require the consent of the Data Subject as it is necessary for the pursuit of the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR.

4 - Modalities and duration of treatment

The processing of Personal Data is carried out by means of the operations indicated in Article 4 no. 2) of the GDPR, namely: collection, recording, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion and destruction of Data.

Personal Data are subject to both paper-based and electronic and/or automated processing, also with the help of its core banking system provided by the external provider Consorzio Servizi Bancari Soc. Cons. a r.l. ("**CSE**"), as well as the computer system used by Head Office, the latter called T24.

The Data Controller shall process Personal Data for the time necessary to fulfil the purposes set out above, and - for all the purposes set out in Article 3 above - guarantees that the Data, after the use of the service for which they are collected, may be archived and retained for a maximum period of 10 years, unless otherwise provided for by the applicable regulatory provisions.

5 - Security

The Data Controller has adopted a variety of security measures to protect Data against the risk of loss, misuse or alteration, consistent with the measures expressed in Article 32 GDPR.

If necessary, the Controller may process Personal Data, including through its suppliers, to the extent strictly necessary and proportionate to ensure the security and capacity of a network or of the servers connected to it to withstand, at a given level of security, unforeseen events or unlawful or malicious acts that could, even only potentially, compromise the availability, authenticity, integrity and confidentiality of Personal Data. For these purposes, the Data Controller provides for procedures to manage the breach of Personal Data (*Data Breach*) in compliance with the legal obligations to which it is bound.

6 - Access and Communication

Data may be made accessible for the purposes set out in Article 3 above:

- (a) to employees, collaborators, associates and partners of the Controller, in their capacity as persons in charge and/or internal data processors and/or system administrators, in any country (pursuant to the provisions of Article 7 below);
- (b) to third-party companies or other entities performing *outsourcing* activities on behalf of the Controller, in their capacity as data processors, such as, for example, law firms, employment consultants, credit institutions, accounting and tax consultants;
- (c) contracting authorities in the event that PIB participates in calls for tenders.

Without the express consent of the Data Subject (pursuant to Art. 6 letter b) GDPR), the Data Controller may disclose the Data for the purposes set out in Art. 3 to Supervisory Bodies, Judicial Authorities as well as to all other entities to which disclosure is required by law for the fulfilment of the aforesaid purposes.

The Data will not be disseminated in any case.

7 - Transfer of Data

Data management and storage will take place primarily in Europe.

The management and storage of the Data will take place mainly in Europe, on the Data Controller's servers located in Italy and/or of Persia International Bank PLC (based in London) and/or of third-party companies appointed and duly appointed as Data Processors.

In consideration of the nature of the Italian branch of a foreign company with registered office in London (United Kingdom), the management and storage of the Data will be carried out in accordance with the laws, decrees, regulations and rulings issued by any government, legislative authority, supervisory and regulatory authority, public authority or commission that has jurisdiction and/or claims to have jurisdiction over the privacy, protection, processing, collection, handling or disclosure of Personal Data in a state, province, or territory to which the Data Subject belongs, and which may, without limitation, be: (i) in relation to EU/EEA member states, in the GDPR and the laws or regulations from time to time applicable and implementing the provisions of the GDPR; or (ii) with respect to the UK, in the Data Protection Act 2018 and the UK GDPR, as amended, updated and supplemented from time to time.

8 - Nature of data provision and consequences of refusal to answer

The Data Subject's Data, collected or in any case obtained by the Data Controller, are deemed necessary and failure to provide them will make it impossible for the Data Controller to carry out activities relating to the main processing, i.e. management:

- (a) of the Contract;
- (b) annexes to the Contract

Pursuant to Articles 9 and 10 GDPR, the Company may also become aware of **special categories of personal data** (i.e. data revealing '*racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership...genetic data, biometric data intended to uniquely identify a natural person, data concerning a person's health or sex life or sexual orientation*') and **personal data relating to criminal convictions and offences**.

Their processing will comply with the principles of necessity, purpose, proportionality, lawfulness and fairness.

9 - Rights of the Data Subject

Each Data Subject has the rights set out in Article 15 GDPR, namely the rights to:

- (a) **obtain confirmation of the existence or otherwise of Personal Data concerning the Data Subject**, even if not yet recorded, and their communication in intelligible form;
- (b) **obtain the indication:**
 - i. the origin of the Personal Data (when the Data are not obtained directly from the visitor);
 - ii. the purposes and methods of processing;
 - iii. the logic applied in the event of processing carried out with the aid of electronic instruments;
 - iv. the identification details of the owner, the responsible persons and the designated representative pursuant to Art. 3(1) GDPR;
 - v. of the subjects or categories of subjects to whom the Personal Data may be communicated or who may become aware of them in their capacity as designated representative in the territory of the State, data processors or persons in charge of processing;
 - vi. the retention period of the Data or the criteria for determining it;
- (c) **obtain:**
 - i. **updating, rectification** or, when the Data Subject has an interest, **integration of the Data**;

- ii. the **deletion**, transformation into anonymous form or **blocking** of Data processed in breach of the law, including Data whose retention is not necessary in relation to the purposes for which the Data were collected or subsequently processed;
 - iii. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the Data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;
- (d) **object in** whole or in part:
- i. for legitimate reasons to the processing of Personal Data concerning the Data Subject, even if pertinent to the purpose of collection;
 - ii. the processing of Personal Data for the purpose of sending advertising or direct sales material or for the performance of market research or commercial communication, by means of automated calling systems without the intervention of an operator by e-mail and/or by traditional marketing methods via telephone and/or paper mail.
- (e) **limitation of the processing**, in certain circumstances, for example in the event of a dispute as to the accuracy of the Data, for the period necessary for the Controller to verify the accuracy of the Data;
- (f) **portability of** Data (Art. 20 GDPR);
- (g) **complaint to the** competent **Supervisory Authority** based on where the GDPR violation took place.

The Controller shall do so without delay and, at the latest, within one month of receipt of the request. The deadline may be extended by two months if necessary, taking into account the complexity and number of requests received by the Controller. In such cases, the Data Controller shall, within one month of receipt of the request, inform and inform the Data Subject of the reasons for the extension

10 - How to exercise rights

The Interested Party may exercise its rights at any time by sending:

- (a) an e-mail to privacy@persiabank.co.uk;
- (b) a registered letter with return receipt to Persia International Bank, Milan Branch, Piazza della Repubblica no. 32, Milan (MI) 20124.

12 - Amendments to this notice

Any updates to this notice will be promptly made available to the Data Subject by appropriate means. Notice will also be given as to whether the Controller will process the Personal Data of the Data Subject for purposes other than those set out in this notice before proceeding and in time to give consent if necessary.