

**ASSOCIATION OF FOREIGN BANKS**  
**FAIR PROCESSING NOTICE ("NOTICE")**

1. **What is this document and why should you read it?**

This privacy notice explains how and why the Association of Foreign Banks (a trade body which represents the interests of the foreign banking sector in the UK, also referred to as "**AFB**", "**we**", "**our**" and "**us**") uses personal data about individual representatives of our full members, prospective members and former members (together "**Members**"), the users of our website at foreignbanks.org.uk (the "**Website**") and key contacts at our suppliers (together, "**you**").

You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.

2. **AFB's data protection responsibilities**

"**Personal data**" is any information that relates to an identifiable natural person. Your name, business address and contact details are all examples of your personal data, if they identify you.

The term "**process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

AFB is a so-called "**controller**" of your personal data. This means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

3. **What types of personal data do we collect and where do we get it from?**

You will fall into one of the following categories of individuals, about whom we process personal data:

- (a) CEO or other senior person at an organisation which may become a Member, is an existing Member or a former Member (in each case a "**Key Contact**");
- (b) employees or other members of staff notified to us directly or by Key Contacts ("**Member Contacts**");

- (c) users of our Website;
- (d) keys contacts at our suppliers; or
- (e) other individuals that otherwise communicate or engage with us.

Accordingly, we collect and process different types of personal data about you whether you are a Key Contact, Member Contact, when you visit our Website, or where you otherwise communicate or engage with us. We also obtain some personal data from other sources, and create some personal data ourselves.

If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting [secretariat@foreignbanks.org.uk](mailto:secretariat@foreignbanks.org.uk)

We collect your personal information from various sources. The table below sets out the different types of personal information that we collect and the sources we collect it from.

(a) <b><u>Category</u></b>	(b) <b><u>Type of personal data</u></b>	(c) <b><u>Collected from</u></b>
<b>Contact Information</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Employer (e.g. Member details), your place of work and job title</li> <li>• Business Address</li> <li>• Business Telephone and/or fax number</li> <li>• Business Email address</li> <li>• Your contact/marketing preferences</li> </ul>	<ul style="list-style-type: none"> <li>• The relevant Member</li> <li>• You</li> <li>• Publicly available information</li> </ul>
<b>Membership Information</b>	<ul style="list-style-type: none"> <li>• Contact Information (see above)</li> <li>• Membership status of your employer and your status as a Key Contact or Member Contact of that Member</li> <li>• Payment information</li> <li>• You/your organisation's banking details</li> <li>• Your attendance at events arranged by or on behalf of us, and other events which we notify you of ("<b>Events</b>")</li> <li>• Communications we may have with you, whether relating to an Event or not</li> <li>• Any additional information that you provide to us voluntarily, including (for example) requirements for attendance at Events (please also see Sensitive Information below)</li> <li>• Responses to surveys in relation to Events and/or us</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Your bank/your organisation's bank</li> </ul>
<b>Website Information</b>	<ul style="list-style-type: none"> <li>• IP address and other online identifiers / web beacons</li> <li>• User names, passwords and other log-in information (as applicable)</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Device used to access the Website</li> </ul>

**Sensitive Information**

<ul style="list-style-type: none"> <li>• Details of your online browsing activities on our website, such as the pages or areas of our website that you visit</li> <li>• Your account settings including any default preferences and any preferences we have observed.</li> </ul>	<ul style="list-style-type: none"> <li>• Our Website</li> </ul>
<ul style="list-style-type: none"> <li>• Any special requirements for attendance at Events, including dietary or accessibility requirements</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>

**4. What do we do with your personal data and why?**

We process your personal data for particular purposes in connection with your status as a Key Contact or Member Contact, use of our Website, attendance at Events, your communication or other engagement with us and the management and administration of our business.

We are required by law to always have a so-called “lawful basis” (i.e. a reason or justification) for processing your personal data. The table below sets out the purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

Please note that where we have indicated in the table that our processing of your personal data is either:

- (a) necessary for us to comply with a legal obligation; or
- (b) necessary for us to take steps, at your request, to potentially enter into a contract with you, or to perform it,

and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract or engagement with you.

Purposes of processing	Lawful basis			
	Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
<b>Contact Information</b>				
a) Where you are Key Contact, to keep a record of your status with the Member, and contact you in relation to the membership of the Member you represent		✓		✓ (It’s important that we keep you updated of your membership and is in our interest to invite new organisations to become members or

Purposes of processing	Lawful basis			
	Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
				correspond with former members)
b) Where you are a Member Contact to contact you in relation to our services and events which may be of interest, in accordance with our agreement or arrangement with the relevant Member				✓ (In order to comply with our agreement with the relevant Member)
c) Responding to your enquiries and/or complaints				✓ (It's important that we can respond to you in relation to such matters)
d) Confirming and processing attendance at an Event		✓		✓ (Where there is no contract with you for attendance at the event, it is in our interests to process your attendance to ensure that you have a place, and confirm this to you)
e) Sending you information (including direct marketing) as set out in the section "How do we communicate with you?", below	✓			✓ (It is important to keep you updated of Events and our services, in addition to factual updates to our engagement with you or the status of the relevant membership)

### Website Information

- |   |  |  |  |  |
|---|--|--|--|--|
| f) Ensure the operation and performance of the Website<br>(PLEASE ALSO SEE THE COOKIES SECTION BELOW) |  |  |  | ✓<br>(We need to ensure the Website functions correctly) |
| g) To improve the functionality of the Website  |  |  |  | ✓  |

Purposes of processing	Lawful basis			For our legitimate interests
	Your consent	To perform a contract with you	To comply with a legal obligation	
				(It is in our interest to keep the Website up to date and improve its functionality for the benefit of users) ✓
h) To enable you to create accounts and log-in to them via the Website				(It is in our interests to grant you access to a private log-in where you can access information relevant to your use of our services) ✓
i) To assist you with any user account or log-in queries				(It is in our interests to assist you with any issues you may have in relation to your online user account)
<b>Membership Information</b>				
j) To take payment for events and deliver our services to you or the recipient/attendee you indicate, to deal with any complaints or any after sales services		✓		
k) To protect you and our business from fraud to minimise the risk of false details being used		✓		✓ (It is important that we seek to limit incidents of fraud)
l) To keep a record of Events attended by you				✓ (It is important for our record keeping purposes and to better tailor the notification of Events to Members and their member Contacts)
<b>All categories</b>				
m) Establishing and enforcing our legal rights and obligations and monitoring			✓	

Purposes of processing	Lawful basis			
	Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
to identify and record fraudulent activity				
n) Complying with instructions from law enforcement agencies, any court or otherwise as required by law			✓	
o) For our general record-keeping and Member relationship management		✓		✓ (We need to store Member related information so we can refer back to it)
p) Managing the proposed sale, restructuring or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organisation			✓	✓ (We have a legitimate interest in being able to sell any part of our business)
q) To keep records required by law or to evidence our compliance with laws, including tax laws, consumer protection laws and data protection laws.			✓	
r) Resolving any complaints from or disputes with you		✓		✓ (We need to be able to try and resolve any complaint or dispute you might raise with us)

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand and improve the use of our Website.

## 5. Sensitive Information

Some of the processing described in the above table will include the processing of 'special categories of personal data' and/or sensitive personal data (together, "**Sensitive Information**" – as set out in the table at

**paragraph 3**, above). This refers to sensitive or special categories of personal data which we are required to process with more care, according to applicable laws. #

We will only process Sensitive Information in relation to you where, in advance of an Event, we are provided with details of any dietary or mobility requirements that apply to you and which should be catered for at the relevant Event. Our processing of this Sensitive Information will be based on your explicit consent.

## 6. **Who do we share your personal data with, and why?**

Sometimes we need to disclose your personal data to other people.

From time to time we may ask third parties to carry out certain business functions for us, such as the administration of our Website and IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate security standards in place to protect your personal data. Examples of these third party service providers include our IT systems software and maintenance, back up, and server hosting providers.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, where the relevant disclosure is:

- (a) to Event organisers in relation to your attendance (or apologies) for an Event;
- (b) if we buy or sell our business (or part of it) in connection with a share or asset sale, we may disclose or transfer your personal data to the prospective seller or buyer and their advisors; and
- (c) if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.

We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

- (a) IT support, Website and data hosting providers and administrators;
- (b) payment processors in relation to memberships and attendance at Events;

- (c) consultants and professional advisors including legal advisors and accountants;
- (d) courts, court-appointed persons/entities, receivers and liquidators;
- (e) business partners and joint ventures;
- (f) Event organisers and Event suppliers (e.g. the relevant catering company);
- (g) insurers; and
- (h) governmental departments, statutory and regulatory bodies including (in the UK) the Information Commissioner's Office, the police and Her Majesty's Revenue and Customs.

**7. Where in the world is your personal data transferred to?**

AFB is UK based and the majority of our processing of your personal data takes place within the UK. However, some of our suppliers (please see above) may have processing operations in other jurisdictions and we may transfer your personal data to recipients that are established in jurisdictions other than your own, for example, in relation to certain Events.

Please be aware that the data protection laws in some jurisdictions may not provide the same level of protection to your personal data as is provided to it under the laws in your jurisdiction.

**8. How do we keep your personal data secure?**

We will take specific steps (as required by applicable data protection laws) to ensure we take appropriate security measures to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

**9. How long do we keep your personal data for?**

We will only retain your personal data for a limited period of time and for no longer than is necessary for the purposes for which we are processing it for. For example:

- (a) we ask Key Contacts to update the details of Member Contacts on an annual basis and where Member Contacts are no longer relevant to that Member, their personal data will be deleted (save where they have moved to another Member); and



- (b) we will generally retain Key Contact and Member Contact information for the duration of the relevant Member's membership and between 6 months and 1 year following the termination of such membership.

In these circumstances and others, personal data may be retained longer and this will depend on a number of factors, including:

- (a) any laws or regulations that we are required to follow;
- (b) whether we are in a legal or other type of dispute with each other or any third party;
- (c) the type of information that we hold about you; and
- (d) whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

#### 10. **How do we communicate with you?**

Where you are a Key Contact, we will use your personal data in order to contact you in relation to an existing or former Membership (for which you are or were the Key Contact). Where no membership currently exists, we will use your personal data to contact you (on a business to business basis, as a representative of the bank/organisation you represent) to discuss membership options.

Where you are a Member Contact, we will use your personal data in order to contact you in relation to Events services, promotions and/or offers which may be of interest, in accordance with our agreement with the relevant Member. Such communications will be to you as a representative of the relevant Member (on a business to business basis).

In each case, such communications will be based on our legitimate interest and you will have the right to opt-out of receiving further marketing communications from us.

To the extent that we send any direct marketing to you (on a business to consumer basis), we will ensure that we have a lawful basis and provide you with the opportunity to opt-out of receiving such communications where we rely on legitimate interest, or (where necessary) obtain your explicit consent.

#### 11. **Cookies**

When you visit the Website, we generate one or more "cookies."

If you do not agree to our use of cookies, you should set your browser settings accordingly or not use the Website. Please be aware that if you disable the cookies that we use, this may impact your user experience while using the Website.

The table below summarizes the different types of cookie we use on the Website, together with their respective purpose and duration (i.e. how long each cookie will remain on your device).

Two types of cookies may be used on the Website - "session cookies" and "persistent cookies". Session cookies are temporary cookies that remain on your device until you leave the Website. A persistent cookie remains on your device for much longer or until you manually delete it (how long the cookie remains on your device will depend on the duration or "lifetime" of the specific cookie and your browser settings).

Cookies used on the Website:

<b>Type of Cookie</b>	<b>What do they do?</b>	<b>Do these cookies collect my personal data / identify me?</b>
Necessary	Cookies that are essential to making the Website work correctly. They enable visitors to move around our website and use our features. Examples include remembering previous actions (e.g. entered text) when navigating back to a page in the same session.	These cookies do not identify you as an individual.  If you do not accept these cookies, it may affect the performance of our website.
Performance	Cookies that help us understand how visitors interact with our web properties by providing information about the areas visited, the time spent on the website and any issues encountered, such as error messages. They help us improve the performance of our websites, alert of any concerns and more.	These cookies don't identify you as an individual. All data is collected and aggregated anonymously.
Functionality	Cookies that allow our web properties to remember the choices you make (such as your user name, language or the region you are in) to provide a more personalized online experience.	The information these cookies collect may include personally identifiable information that you have disclosed, such as a username, for example. We shall always be transparent with you about what information we collect, what we do with it and with whom we share it.  If you do not accept these cookies, it may affect Website performance and functionality and may restrict access to web content.

We do not currently employ any targeting or advertising cookies on our Website.

Cookies are files or pieces of information that may be stored on your computer (or other internet-enabled devices, such as a smartphone or tablet) when you visit the Website. A cookie will usually contain the name of the website from which the cookie has come from, the "lifetime" of the cookie (i.e. how long it will remain on your device) and a value, which is usually a randomly generated unique number.

We use cookies to make the Website easier to use and to better tailor our web presence and products to your interests and needs. Cookies may also be used to help speed up your future activities and experience on the Website. We also use cookies to compile anonymous, aggregated statistics that allow us to understand how people use our web properties and to help us improve web structure and content. We cannot identify you personally from this information.

Most internet browsers are initially set up to automatically accept cookies. You can change the settings to block cookies or to alert you when cookies are being sent to your device. There are a number of ways to manage cookies. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings.

If you disable the cookies that we use, this may impact your experience while on the Website. For example, you may not be able to visit certain areas of the Website.

If you use different devices to view and access the Website (e.g. your computer, smartphone, tablet etc.), you will need to ensure that each browser on each device is adjusted to suit your cookie preferences.

12. **What are your rights in relation to your personal data and how can you exercise them?**

Where our processing of your personal data is based on your **consent** (please see the tables above), you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we are relying on – in which case, we will let you know.

Where our processing of your personal data is based on the **legitimate interests** (please see the tables above), you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights

and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Where we are processing your personal data for **direct marketing** purposes, you have the right to object to that processing.

You have the right to (subject to applicable laws and certain limitations):

- (a) access your personal data and to be provided with certain information in relation to it, such as the purpose for which it is processed, the persons to whom it is disclosed and the period for which it will be stored;
- (b) require us to correct any inaccuracies in your personal data without undue delay;
- (c) require us to erase your personal data;
- (d) require us to restrict processing of your personal data;
- (e) receive the personal data which you have provided to us, in a machine readable format, where we are processing it on the basis of your consent or because it is necessary for your contract with us (please see the tables above) and where the processing is automated; and
- (f) object to a decision that we make which is based solely on automated processing of your personal data (however, we do not currently conduct any such decision making).

You also have the right to lodge a complaint with the Information Commissioner's Office, which is the UK data protection regulator. More information can be found on the Information Commissioner's Office website at <https://ico.org.uk/>.

### 13. **Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice by email. We also encourage you to check this notice on a regular basis.

### 14. **Where can you find out more?**

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact [secretariat@foreignbanks.org.uk](mailto:secretariat@foreignbanks.org.uk)