

MALAYAN BANKING BERHAD, LONDON BRANCH

Customer Privacy Notice (The General Data Protection Regulation)

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Malayan Banking Berhad, London Branch (“Maybank London”) 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.

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 Malayan Banking Berhad, London Branch (“Maybank London”) of 77 Queen Victoria Street, EC4V 4AY, London, United Kingdom registered number FC005158.

2. What information is covered by this Privacy Notice?

This Privacy Notice covers all personal information processed by Maybank London 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?

Information we hold about you will often come from you directly (e.g. when you apply for a new product), this will include the following:

- Personal details (e.g. name, date of birth, passport information or other identification information);
- Contact details (e.g. phone number, email address, postal address or mobile number);
- Transactional details (e.g. payments you make and receive)
- Financial information (e.g. bank account number and financial history) including information you provide for the purposes of providing payment initiation services and account information services regarding accounts you hold with other providers;
- Information about criminal conviction and offences (e.g. for mortgage applications); and
- Information about any other Maybank products and services you currently have, you have applied for, or you have previously held.

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.

4. How do we use your personal information?

What we use your information for	The legal basis for doing so
To provide, manage and personalise our services to you.	<ul style="list-style-type: none"> • Where the law requires this. • Where necessary for the performance of our agreement or to take steps to enter into an agreement with you. • Where it is in our legitimate interests to ensure that our customer accounts are well-managed so that our customers are provided with a high standard of service, to protect our business interests and the interests of our customers.
To communicate with you about your product/service for legal, regulatory and servicing purposes.	<ul style="list-style-type: none"> • Where the law requires this. • Where necessary for the performance of our agreement or to take steps to enter into an agreement with you.
To manage complaints, undertake remediation activities and to resolve queries.	<ul style="list-style-type: none"> • Where the law requires this. • Where necessary for the performance of our agreement or to take steps to enter into an agreement with you. • Where it is in our legitimate interests to ensure that complaints are investigated.
To check your instruction to us, and to analyse, assess and improve our services, and for training and quality purposes. We may monitor or record any communications between you and us, including telephone calls.	<ul style="list-style-type: none"> • Where the law requires this. • Where it is in our legitimate interests to develop and improve our systems, train our staff and provide our customer with a high standard of service.
To undertake checks for the purposes of security, detecting and preventing fraud and money laundering and to verify your identity before we provide services to you.	<ul style="list-style-type: none"> • Where the law requires this. • Where necessary for the performance of our agreement or to take steps to enter into an agreement with you. • Where it is our legitimate interests to detect, prevent and investigate fraud, money laundering and other crimes to verify your identity in order to protect our business.
To develop and improve products and services through assessment and analysis of the information, including credit or behavioural scoring (or both), market and product analysis, and market research.	<ul style="list-style-type: none"> • Where necessary for the performance of our agreement or to take steps to enter into an agreement with you. • Where it is in our legitimate interests to develop and improve our products and services that our customers want to use and to ensure our business model remains competitive.



<p>To make scoring decisions relating to companies or other business you have a relationship with.</p>	<ul style="list-style-type: none">• Where it is in our legitimate interests to ensure that our business model remains viable by only providing credit to customers who can afford to pay us back.
<p>To recover debts owed and enforce other obligations we are entitled to under our agreement(s) with you, as well as to protect ourselves against harm to our rights and property interests.</p>	<ul style="list-style-type: none">• Where the law requires this.• Where necessary for the performance of our agreement or to take steps to enter into an agreement with you.• Where it is in our legitimate interests to ensure that our business is run prudently and we are capable of recovering the debts owed to us, as well as ensuring our assets are protected.
<p>To (if you ask us to) provide payment initiation and account information services regarding accounts you hold with other providers, or where third party providers request that we provide account information or payment initiation services in relation to accounts you hold with us (if you ask third party provider to make this request).</p>	<ul style="list-style-type: none">• In the case of data out (e.g. passing data to payment services aggregators), where the law requires this.• In the case of data in (e.g. display of your other accounts), where necessary for the performance of our agreement or to take steps to enter into an agreement with you.
<p>To verify your identity and the identity of joint account holders.</p>	<ul style="list-style-type: none">• Where the law requires this.• Where necessary for the performance of our agreement or to take steps to enter into an agreement with you.• Where it is in our legitimate interests to verify your identity in order to protect our business and to comply with laws that apply to us.
<p>To prevent and detect fraud, money laundering and other crimes (such as identity theft). For example, we may use CCTV in and around our premises to monitor and collect images.</p>	<ul style="list-style-type: none">• Where the law requires this.• Where it is in our legitimate interests to prevent and investigate fraud, money laundering and other crimes to verify your identity in order to protect our business and to comply with laws that apply to us.• Where such processing is a contractual requirement of the services or financing you have requested.
<p>To comply with regulatory and legal obligations to which we are subject and cooperate with regulators and law enforcement bodies.</p>	<ul style="list-style-type: none">• Where the law requires this.• Where it is in our legitimate interests to protect our business.• For the use of sensitive data, where it is in the substantial public interest.

<p>To prepare high-level anonymised statistical reports. We compile these reports from information about you and other Maybank customers. The information in these reports is never personal and you will never be identifiable from them. We may share these statistical and anonymised reports with third parties including non-Maybank companies, or we may use them for our own analytical purposes e.g. to analyse our credit risk.</p>	<ul style="list-style-type: none"> • Where the law requires this. • Where it is in our legitimate interests to develop and prepare these reports to enable us to better understand how our customer use our products and changes we could make to improve them.
<p>To personalise the marketing message we send you to make them more relevant and interesting.</p>	<ul style="list-style-type: none"> • Where it is in our legitimate interests to provide customers with information more relevant to their circumstances.

When we process personal data to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests do not override your interests or fundamental rights and freedom

<p style="text-align: center;"><u>Special Categories of Data</u></p>	
<p>Some of the information we collect are special categories of personal data (also known as sensitive personal data). Where we process such sensitive personal data, we will usually do so on the basis that it is necessary for reasons of substantial public interest, to establish, exercise or defend any legal claims, or in some cases, with consent. In any case, we will carry out the processing in accordance with the applicable laws.</p>	
<p>What we use your sensitive data for</p>	<p>The legal basis for doing so</p>
<p>Customer due diligence checks may reveal political opinions or information about criminal convictions or offences about you.</p>	<p>Where it is in the substantial public interest.</p>
<p>We may use your medical information for some of the purposes set out above e.g. to resolve complaints and queries, to help provide, manage and personalise our services to you.</p>	<p>Where it is in the substantial public interest.</p>
<p>To comply with regulatory and legal obligations to which we are subject and cooperate with regulators and law enforcement bodies.</p>	<p>Where it is in the substantial public interest.</p>



We will send you messages by post, telephone, text, email and other digital methods (and new methods that may become available in the future). These messages may be:

- To help you manage your account(s);
- To comply with our regulatory obligations, such as changes to your agreements, and to give you the information you need to manage your money; and
- To keep you informed about the features and benefits of the products and services you hold with us

5. **Do we use your personal information for direct marketing?**

With your permission, we may send you carefully selected information about our products and services. You have the right to opt out of receiving direct marketing at any time by writing to us, visiting our branch or calling us.

6. **With which third parties do we share your personal information?**

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

Maybank's Group of companies: We may share your personal information among our group of companies, including our subsidiaries, 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.

Payment-processing service providers and others: We may share your personal information with service providers that helps us process your payments, as well as other financial institutions who are members of the payment schemes or involves in making the payment.

Our service providers: We use other companies, agents or contractors to perform services on our behalf or 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.
- marketing, advertising and communications agencies.
- credit reference agencies.
- external 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.

Other financial institutions who you ask us to deal with: For example when you switch your account from Maybank.

Companies that you have paid from your Maybank account: In the event that the companies request for our help so they can apply a payment to you (because they did not receive the information they needed with the payment), for example, utility companies.



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 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.

Anyone to whom we transfer or may transfer our rights and duties in this agreement.

We will not sell your personal information to third parties.

7. **Do we transfer personal information outside the EEA?**

Your personal information may be transferred to and processed in Malaysia and Singapore by our affiliates 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 EU standard contractual clauses (or equivalent measures) with the party outside the EEA.

(Please see: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)

8. **Do we share information about you with tax authorities outside the UK?**

We may be required by law or regulation to share information about your accounts with the UK or other relevant tax authorities, either directly or via local tax authority. The tax authority we share the information with could then share the information with other appropriate tax authorities.

If we need supplementary documents or information from you about this, you must provide them. If you fail to do so, we may need to close your account or if the law or other regulations require us to do so, we will withhold parts of certain payments received into your account and pass the withheld funds to the relevant tax authorities.

9. **What are your rights?**

You have certain rights regarding your personal data, subject to local law. These include the following rights to:

- To request a copy of the personal data we hold about you. For your own privacy and security, at our discretion we may require you to prove your identity before providing the requested information ;
- To request that we supply you (or a nominated third party) with an electronic copy of the personal data that you have provided us with;
- To inform us of a correction to your personal data;
- To exercise your right to restrict our use of your personal data 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;



- To exercise your right to erase your personal data 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;
- To object to particular ways in which we are using your personal data. 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; and
- To withdraw your consent, free of charge. This includes cases where you wish to opt out from marketing messages that you receive from us.

Your ability to exercise these rights will depend on a number of factors and in some instances, we will not be able to comply with your request e.g. because we have legitimate grounds for not doing so or where the rights do not apply to the particular data we hold on you.

You can make a request to exercise any of these rights in relation to your personal information by sending the request to the **mbbldn.gdpr@maybank.uk.com** or contact us at **+44 (0)20 7638 0561**

You also have the right to lodge a complaint with the local 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 (0)303 123 1113
Email : casework@ico.org.uk
Website : www.ico.org.uk
Web-form : www.ico.org.uk/concerns/
Address : Water Lane, Wycliffe House, Wilmslow, Cheshire, SK9 5AF

10. 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.

11. 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.

12. How do we deal with children's privacy?

We will never knowingly collect personal information from individuals under the age of thirteen (13) years without first obtaining verifiable parental consent. If you are under the age of 13 you should not provide information to us. If we become aware that a person under 13 has provided personal information to us without verifiable parental consent, we will remove such personal information from our files.

13. How can you contact us?

If there is any question or concern regarding this Privacy Notice, please contact us via:

Telephone: +44 (0)20 7638 0561
Email : mbldn.gdpr@maybank.uk.com
Post : Malayan Banking Berhad, London Branch
77, Queen Victoria Street,
EC4V 4AY, London
United Kingdom

14. 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 via email and letter.

25th May 2018