



BANK OF INDIA, U.K. OPERATIONS
CUSTOMERS: GDPR PRIVACY NOTICE

Privacy notice

This notice explains how Bank of India (referred to in this notice as **we, us** or **our**) collects and uses personal data about existing and future customers for the purpose of providing permitted banking facilities and related purposes.

Bank of India, UK Operations respect your privacy and is committed to protecting the privacy of our website visitors and service users. This Privacy Policy will inform you as to how we look after any personal information and tell you about your privacy rights and how the law protects you.

This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This notice covers the following:

What is personal data?

How do we collect personal data?

What personal data do we collect?

How do we use your personal data?

What is the legal basis that permits us to use your personal data?

How do we share your personal data?

How do we keep your personal data secure?

When do we transfer your personal data overseas?

For how long do we keep your personal data?

Your rights in relation to your personal data

Complaints

We keep this privacy notice up to date, so if there are any changes to the way in which your personal data is used this privacy notice will be updated and we will notify you of the changes by placing it in our bankofindia.uk.com website.

Our contact details are as follows:

Bank of India

Office of the Chief Executive- European Branches

4th Floor, 63 Queen Victoria Street,

London, EC4N 4UA

Telephone: 020 7965 2418

We have appointed a data protection officer who has responsibility for advising us on our data protection obligations. You can contact the data protection officer using the following details:

Ms. Mruna Patel

Telephone: 02079652575 Email: dpocoboi@bankofindia.uk.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

What is personal data?

Bank of India is a data controller registered with the Information Commissioner under number Z5377790.

Personal data is information relating to an identifiable living individual and it covers any information that tells us something about you. This could include information such as your name, contact details, date of birth, medical information and bank account details as follows.

- **Identity Data** includes first name, maiden name, last name, username or similar identity identifiers (including reference numbers we have allocated to identify you) marital status, title, date of birth and gender and job title.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Enquiry Data** – includes Identity, Contact and Financial Data contained in any enquiry you submit to us regarding services and products.
- **Financial Data** includes bank accounts details, payment card details, salary and other income and assets details.

- **Regulatory Data** includes personal data involving credit and identification checking and validation, money-laundering checks and information about criminal convictions and offences
- **Transaction Data** includes details about payments to and from you and other details of services and products we provide to you such as the date, amount, currency and the name and type of supplier (for example, supermarket services, medical services, transactions in assets, retail services) and from the payments which are made to and from your Accounts with us.

Personal data includes any information that directly or indirectly identifies you, including your, any photograph that we take of you, together with any signature we get from you for our account-opening process for the purpose of checking your identity or to provide products and services to you. Personal data does not include data where the identity has been removed (anonymous data).

In order to process and use your personal information, we generally rely on the following legal bases:

- processing **is necessary for the performance of the services and products** we provide to you as a contractual necessity; or
- processing is necessary for the purposes of the **legitimate business interests** pursued by Bank of India Group companies; or
- you have given **explicit consent** to the processing of your personal information for one or more specified purposes.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

How do we collect personal data?

We collect personal data about you from various sources including:

- from you when you contact us directly through the application;
- from other people when we check references or carry out background checks – if we do this we will inform you during the recruitment process of the exact checks that are carried out;
- any personal data we obtain from searching public records, such as the Electoral Roll, to help us verify your identity; and

What personal data do we collect?

We collect the following categories of personal data about you:

- Personal contact details such as name, title, address, telephone number and personal email addresses
- Date of birth
- Gender
- Equal opportunities monitoring information such as ethnicity, religion, disability and sexual orientation
- Marital status and dependents
- National insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Location of employment or workplace
- Copies of identification documents such as your passport and driving licence
- Employment/engagement records (including job titles, work history)
- Information about criminal convictions and offences committed by you

Your Information generally includes information which we:

- a. obtain from you or third parties, such as employers, joint account holders, credit reference agencies, fraud prevention agencies or other organizations when you apply for an account with us or for any of our other products or services, or which you or they give to us at any other time; or
- b. learn from the way in which your accounts with us are administered and managed, from the transactions made such as the date, amount, currency and the name and type of supplier (for example, supermarket services, medical services, transactions in assets, retail services) and from the payments which are made to and from your accounts with us.

Where you provide personal and financial information about others (such as dependents, other family members and a joint account holder) you confirm that you have their consent or are otherwise entitled to provide this information to us and for it to be used in accordance with these Terms and Conditions.

How do we use your personal data?

In order to provide you with bank accounts and other products and services we need to collect, use, share and store personal information about you and your transactions (“**Your Information**”). This section explains how we will use Your Information.

We and other companies in the Bank of India group of companies will use Your Information to manage your accounts, give you statements and provide our services and products, for assessment and analysis (including credit and/or behaviour scoring, market and product analysis), to prevent and detect fraud, money laundering and other crime, to carry out regulatory checks, to meet our obligations to any relevant regulatory authority, to develop and improve our services to you and other customers and to protect our interests.

Purpose	Data type	Legal bases
To on-board you as a new customer and open a new account	Identity Data Enquiry Data Contact Data Financial Data Profile Data	1. Legitimate interests 2. Contractual necessity
To verify your identity, address and make anti-money laundering checks and risk assessment for crime and fraud prevention purposes	Identity Data Contact Data Enquiry Data Regulatory Data Financial Data	1. Legitimate interests 2. Contractual necessity 3. Legal obligation
To deliver banking services in connection with account statements, charges list, payments, transfer of funds/ accounts, remittances etc.,	Identity Data Enquiry Data Contact Data Transaction Data Financial Data	1. Legitimate interests 2. Contractual necessity 3. Legal obligation 4. Explicit consent
To meet our regulatory compliance and reporting obligations including to prevent and detect fraud, money laundering and other crime	Identity Data Contact Data Transaction Data Financial Data Regulatory Data Enquiry Data	1. Legitimate interests 2. Legal obligation

Use of Your Information for Marketing Purposes

With your permission we and other members of the Bank of India group of companies may use Your Information to inform you by letter, telephone, text messages, digital television, email and other electronic methods about products and services (including those of others) which may be of interest to you. If you do not want us to contact you about such products and services please let us know by writing to your local branch.

What is the legal basis that permits us to use your personal data?

Under data protection legislation we are only permitted to use your personal data if we have a legal basis for doing so as set out in the data protection legislation. We rely on the following legal bases to use your personal data for banking services related purposes:

- Where we need your personal data **to perform the contract** we have entered into with you.
- Where we need to **comply with a legal obligation**.
- Where it is necessary for **our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests**.

In order to process and use your personal information, we generally rely on the following legal bases:

- processing **is necessary for the performance of the services and products** we provide to you as a **contractual necessity**; or
- processing is necessary for the purposes of the **legitimate business interests** pursued by Bank of India Group companies; or
- you have given **explicit consent** to the processing of your personal information for one or more specified purposes.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

In more limited circumstances we may also rely on the following legal bases:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

Some personal data is classified as "special" data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious or philosophical beliefs, political opinions, sex life, sexual orientation and trade union membership. This personal data is more sensitive and we need to have further justifications for collecting, storing and using this type of personal data. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data.

How do we share your personal data?

We may share Your Information with the following third parties, wherever located:

- a. other companies within the Bank of India group of companies (which means our subsidiaries, our ultimate holding company, Head Office and its subsidiaries)
- b. our partners and companies and organisations that provide services to us or assist us or act as our agents including but not limited to sub-contractors and professional advisors
- c. anyone to whom we may transfer our rights and/or obligations under any agreement we have with you
- d. any third party as a result of any restructure, sale or acquisition of any company within the Bank of India group of companies

- e. your advisers (including but not limited to accountants, lawyers or other professional advisors) where authorised by you
- f. Regulators (Reserve Bank of India and other regulators in India and UK Regulators like FCA/PRA/HMRC/HMT/FSCS etc.), credit reference agencies, fraud prevention agencies, law enforcement and debt recovery agencies, Credit default databases like CIBIL and ECGC, RBI Wilful Defaulters List, CRILC etc. in India and U.K. and other organisations for the purposes of preventing crime, verifying your identity and recovering debt
- g. external auditors and accountants as required to our regulatory, compliance and reporting obligations;

Save as set out above we will not disclose Your Information to anyone unless the disclosure is made with your consent, or we have a duty to do so, or if law or regulation allows us to do so, or our interests mean that we must give the information to prevent and protect ourselves from fraudulent activities.

We may give Your Information to and receive information from credit reference agencies and fraud prevention agencies. We and other organizations may access and use this information to prevent and detect fraud, money laundering and other crimes, to make credit assessments and decisions about credit related services, to enable us to manage and take decisions about your accounts and insurance policies and insurance claims and to recover debt.

Information held about you by the credit reference agencies may already be linked to records relating to your partner or members of your household where a financial “association” has been created. Any enquiry we make at a credit reference agency may be assessed with reference to any associated records. Another person's record will be associated with yours when:

- i. you make a joint application;
- ii. you advise us of a financial association with another person; or
- iii. If the credit reference agencies have existing linked or “associate” records.

This “association” will be taken into account in all future applications by either or both of you and shall continue until one of you applies to the credit reference agencies and is successful in filing a “disassociation”. Credit reference agencies keep a record of our enquiries and may record, use and give out information we give them to other financial institutions, insurers and other organizations. If false or inaccurate information is provided or fraud is suspected details may be passed to fraud prevention and credit reference agencies. Law enforcement agencies may access and use this information. The information recorded by fraud prevention agencies may be accessed and used by organizations in a number of countries including the UK. We can provide the names and addresses of the credit reference and fraud prevention agencies we use if you would like a copy of Your Information held by them. Please contact your local branch if you want to receive details.

How do we keep your personal data secure?

We have put in place appropriate security measures to prevent Your Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process Your Information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

All information you provide to us is stored on our secure servers. Any payment transactions will be similarly secured. Where we have given you (or where you have chosen) a user name and passcode which enables you to access certain parts of our Site like Internet banking, you are responsible for keeping this user name, passcode and memorable word confidential. You must not share these data with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect Your Information, we cannot guarantee the security of Your Information transmitted to our Site; any transmission is at your own risk. Once we have received Your Information, we will use strict procedures and security features to try to prevent unauthorised access at our end.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses in U.K.

When do we transfer your personal data overseas?

Our Bank of India, UK Operations (BOIUK) databases are held by the Bank of India in India. BOIUK has outsourced the storage of a large part of its customer data to the head office i.e. Bank of India in India. As we share Your Information with Bank of India in India and the BOI Group, this will involve transferring your data outside the European Economic Area (EEA).

We may transfer Your Information to our Head Office in India and any Division or branch of our Head Office wherever located (including countries outside the EEA) and to other companies in the Bank of India group of companies or to a service provider or agent wherever located (including countries outside the EEA) for the purposes stated above. We will make sure that the Division, branch, group company, service provider or agent agrees to apply the same levels of protection as we are required to apply to Your Information and agrees to use Your Information in accordance with our instructions. In connection with providing you our services or to comply with our regulatory and legal obligations, we may be required to send personal information to countries outside the EEA which have not been deemed to have adequate standards of data protection. When we do so we aim to perform a risk assessment prior to the transfer and use EU recognised and enforceable specific contracts approved by the European Commission so that your information is protected in line with data protection laws, as applicable in the UK.

Where we process international payments outside the UK at your request, we do so through SWIFT (the international payments system). When we do this Your Information will be processed and stored abroad by other banks or financial institutions involved in completing the payment. Those banks and financial institutions may have to release the information to foreign authorities and other third parties, including those outside the EEA (in which case your personal information may not be protected in line with data protection laws).

Whenever we transfer Your Information out of the EEA and the contractual relationship is within our control, we aim to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

For how long do we keep your personal data?

We will keep your personal information while you have an account with us or we are providing products and/or services to you. At the end of your relationship with us (for example, if you decide to close your account) we will only retain your personal information for as long as necessary to:

- fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements;
- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly; and
- to keep records required by law

Different retention periods apply for different types of personal information. Further details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

Generally to determine the appropriate retention period for the types of personal data we process, including Contact Data, Enquiry Data, Profile Data and Correspondence Data, Marketing and Communications Data, Financial and Transaction Data and Usage Data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. The period of retention also may be dependent on whether the retention is necessary for compliance with any legal, accounting, or reporting obligations to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. When it is no longer necessary to retain your personal information, we will delete or anonymise it.

Your rights in relation to your personal data

You have the right to:

- **Request access to your personal data** (known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. However, it may be noted that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which over ride your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

If you wish to exercise any of the rights set out above, please send your requests to the Data Protection Officer at Bank of India, 63 Queen Victoria Street, London, EC4N 4UA or email at dpocoboi@bankofindia.uk.com marking it for the attention of the Data Protection Officer of BOIUK Operations.

No fee or reasonable fee

You will not have to pay a fee normally to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Complaints

If you have any complaints about the way we use your personal data please contact your branch Manager who will try to resolve the issue or escalate to Data Protection Officer, CE Office Bank of India at 63, Queen Victoria Street, London EC4N 4UA to solve. If we cannot resolve your complaint, you have the right to complain to the data protection authority i.e. the Information Commissioner Office of the UK at Wycliffe House, Water Ln, Wilmslow SK9 5AF.