SBI Shinsei International Limited

Privacy Policy

SBI Shinsei International Limited (the "Firm", "we" or "us") is committed to protecting the privacy and security of any personal information it may collect, in accordance with the UK General Data Protection Regulation 2016/679 (UK GDPR) and the UK Data Protection Act 2018. SBI Shinsei Interational Limited is the data controller in respect of any personal information collected.

This policy sets out how any personal data we may collect from you, or that you provide to us, will be processed by us, and the basis for processing your personal data.

How is your personal information collected?

We may collect data via a variety of ways, such as:

- Where you provide us with information in response to a direct request
- In the ordinary course of our relationship with you
- From third party service providers

The kind of information we may hold about you

Personal information or data, means any information about an individual from which that person can be identified. Personal information we may collect about you includes identification data such as your name, title, gender, signature, email address, telephone number, date of birth, passport and/or driving licence information, employment information and electronic identifying data.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- In order to be able to perform our contractual obligations to 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.

We may also use your personal information in the following situations, which are likely to be rare:

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

Data sharing

Where it is necessary for the performance of our contract with your, or for our internal business processes, we may share your information with third parties, including service providers, professional advisors, regulatory bodies or related, associated or affiliated companies within the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, we will ensure that necessary safeguarding and protections are in place as set out by the UK Data Protection laws.

Data security

We have put in place measures to protect the security of your information. This includes steps to ensure that only persons with appropriate authorisation are able to access your personal information.

You are responsible for ensuring that any information provided to us is sent securely.

Data retention

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 or regulatory requirements.

Your Rights

Under the DPA 2018 and UK GDPR, you have certain rights as an individual which you can exercise in relation to the personal information we may collect about you, such as:

- To request access to the personal data that we may hold about you;
- To correct any inaccurate personal information we may hold about you;
- To request deletion of your personal data in certain circumstances
- To withdraw any consent that you may have provided as the legal basis for our processing of your personal information
- To request the transfer of your personal information to another organisation.

Changes to this privacy policy

This policy will be reviewed periodically to ensure it remains appropriate and reflects any changes in law. Any personal information held will be governed by our most recent policy.

Contact Us

If you have any questions or requests regarding this policy please contact us at <u>SBISIL_Compliance@sbishinsei.co.uk</u>.