

iBanFirst Limited privacy policy

This Privacy Policy was last updated February 2023.

This Privacy Policy is issued by iBanFirst Limited on behalf of itself and iBanFirst holding companies, subsidiaries, and affiliates ('we' or 'us' or 'our'). iBanFirst is a registered trading name of iBanFirst Limited.

iBanFirst Limited recognises the importance of safeguarding all personal data which we may obtain from you or about you. The following Privacy Policy sets out the basis on which any personal information will be collected and processed by us and reflect iBanFirst's commitment to maintaining the confidentiality of personal information we hold on our clients and to provide users of iBanFirst's Website with the best possible service.

When is your personal data collected?

iBanFirst collects personal information in the following places:

- Information you provide by filling in paper-based form;
- Information you provide by filling in forms on our <u>Website</u>;
- Details of your visits to our Website and the resources that you access;
- If you contact us via email, live chat, Contact us form or request a call back form we may keep a record of the correspondence;
- We will digitally record all telephone conversations with our clients;
- If you write a review of our services;
- We may run electronic verification checks on your identity;
- Additional supporting documents which you provide us upon request.

iBanFirst use of your personal data

We use personal information only for the purpose for which we tell you that it has been collected, for other legitimate purposes as permitted by the General Data Protection Regulation (GDPR) 2018 and other relevant laws. We retain your information only as long as necessary for those uses.

We use information held about you in the following ways:

- Ensuring that content from the Website is presented in the most effective manner for you and your computer/electronic device;
- To comply with our legal and regulatory obligations;
- To carry out our obligations arising from any contracts entered into between you and us;
- Keeping you informed by email of similar products or services to those which you have brought, unless you have indicated where possible that you would not like us to do so;
- Providing you with email alerts or FX newsletters which you have consented to receive;
- To notify you about changes to our service.
- Retention of your personal data.

Due to our legal obligations under the Money Laundering Regulations 2017 and the Companies Act 2006 we may hold your personal data up to a maximum of 6 years post surrender of our business relationship with you. Hereafter, your data will be disposed of securely such that you will no longer be identifiable from this information whether this is in paper or electronic format.



Disclosure of your data

We may disclose your personal information to third parties to carry out our services of the contract between iBanFirst International Payments and you. We may also disclose your personal information to third parties to comply with our legal obligations. We may disclose your personal information to any of the following companies:

iBanFirst SA	Chart Media Limited	Dev Logic Limited
Barclays Bank PLC	Opus Telecoms	8X8 Inc
Global Data Consortium	Creditsafe Business Solutions Limited	Salesforce UK Limited
Redbox Group	Sedcom Networks Limited	Affiliates
Microsoft	Comply Advantage	Experian
GB Group	Mailchimp	Trustpilot
Clickatel	Passfort	Salesforce
Relevant authorities	Hubspot	Tableau Software
Intercom	Haines Watts	Haysmacintyre
Keystone Law	Excello Law	

We will not disclose identifiable information about our customers or website users to our advertising partners unless you have explicitly indicated that we can do so by ticking the appropriate box on a paper-based application form or an electronic application on our website.

Protection of your data

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of information transmitted to our website. However, once we receive your information, we use strict security standard and procedures to try and prevent unauthorised access to customer information. Your personal information is transmitted over a secure (https) connection and is encrypted to ensure your data remains safe at any time.

Any personal data we hold on you will not be transferred outside of the European Economic Area (EEA). Therefore, all your information should be secured in line with GDPR 2018.

IP addresses and cookies

We may collect information about your visit to our website and your computer (including where available, your IP address, operating system, and browser type) for system administration to report such information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify you as an individual. We collect such information by using a "cookie" file. Cookies are small pieces of information that are



stored on your computer's hard drive by your browser. They help us to improve our website and make it possible for us to identify some of your preferences. On revising our site, our computer server will recognise the cookie, giving us information about your previous visits. We also use cookies to help protect against fraud. Most browsers are originally configured to accept cookies automatically.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if not configured or if you alter your browser to disable the acceptance of cookies, you may not be able to use the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Website.

Please note that our advertisers may also use cookies, over which we have no control.

If you would like further information on cookies, we recommend you visit: https://www.cookielaw.org

Links to third party websites

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of those websites, please note that those websites have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any personal information to those websites.

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Your rights:

Access to information

You have the right to request all information we hold on you, this is known as a subject access request. If you wish to make a subject access request please contact us in writing, by telephone or by email using the contact details at the end of this privacy policy and we will supply you with our subject access form. Upon receipt of a completed form and one piece of ID (required to ensure we do not disclose your information to unauthorised access) we will acknowledge your request without undue delay or within one month. This information will be free of charge unless your request is seen to be excessive whereby a fee may be required prior to release of your information.

Maintenance of Accurate Information

We strive to make sure that the information we maintain about our customers is accurate, current and complete and we respond to requests to correct inaccurate information without undue delay or within one month of your request.

If your personal details change, you can inform us of any changes in writing, by telephone or by email using the contact details at the end of this privacy policy.

Please be aware that you will have to provide updated forms of proof of identity and/or proof of address prior to requesting a foreign currency exchange.

Right to be forgotten

You may express your right to be forgotten, this can be done by contacting in writing, by telephone or by email using the contact details at the end of this privacy policy. We will do our utmost to comply with your request. However, please note certain information we may have to retain for a specified amount of time to abide by our legal obligations.

You may want to discontinue receiving information from iBanFirst Limited.

While this may mean that you will not receive products or service information of interest to you, we respect anyone's wishes not to be informed directly of these promotions or product introductions.

You may instruct us to exclude you from all future marketing and promotional emails by writing, emailing or telephoning us using the contact details shown below.



Changes to our privacy policy

Any changes we make to our Privacy Policy in the future will be posted on our website. No written notification will be published. Please check our Privacy Policy from time to time to take notice of any changes made. By using the Website and/or any service offered on the Website or by placing orders after we have changed these terms, you will be accepting these changes.

Lead Forensics Cookie

The Lead Forensics tool uses IP tracking for identifying businesses and is not the same as cookies. The Lead Forensics tracking code will only provide information that is readily available in the public domain. It does not, and cannot, provide individual, personal, or sensitive data regarding who has visited the iBanFirst website. It will provide information on what companies have visited our website by identifying by way of their IP address. This data may be used by us to contact the business about their experience or for marketing purposes. We will not pass this data to third parties for any reason. More information can be found www.leadforensics.com.

iBanFirst Limited contact details

Postal Address:

iBanFirst Limited 6th Floor Dashwood House 69 Old Broad Street London EC2M 1QS

General Email Address:

compliance-uk@ibanfirst.com

Main Telephone Number: +44 (0) 203 409 5400

Information Commissioners Office (ICO)

If you have an issue regarding the privacy of your information with us and we cannot solve this please contact the Information Commissioners Office on the following:

ICO Address:

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

ICO Email Address:

registration@ico.org.uk

ICO helpline:

0303 123 1113