

## Scope of this Privacy Notice

1.1. This Privacy Notice applies to each web page that starts with the url [www.ibanfirst.com](http://www.ibanfirst.com) ("**Site**"), which is the property of and is managed by iBanFirst Group. When we say "**we**", "**our**", "**us**" or "**iBanFirst**" in this policy, we are referring to the companies that make up the iBanFirst Group. The companies that currently make up the iBanFirst Group are:

iBanFirst SA, a payment institution established in Belgium and under the prudential supervision of the National Bank of Belgium, with registered office at 350 Avenue Louise, 1050 Brussels, Belgium and with company number BE 0849.872.824.

iBanFirst Ltd, an authorised electronic money institution supervised by the Financial Conduct Authority with registered office at 6th Floor Dashwood House, 69 Old Broad Street, London, EC2M 1QS, United Kingdom and registered with Companies House under number 06260585.

1.2. iBanFirst acts as the controller for the processing of the personal data that we collect from you or that you provide to iBanFirst when you visit our Site ("**Site User**"), when you or your organisation uses our products and services, when you contact us to obtain information or to request a quote (by phone or on our Site), when you visit our premises, when we perform our business activities, when we contact you in relation to our products or services, or when you or your organisation provides a product or service to us.

1.3. We do our utmost to protect and process the personal data that are entrusted to us in a correct and transparent way, more particularly in accordance with the applicable law and especially with the General Data Protection Regulation 2016/679 of 27 April 2016 (the "**EU GDPR**") and the EU GDPR as incorporated into national law in the United Kingdom ("**UK GDPR**"), where applicable, (together referred to as the "**GDPR**"). We will protect such personal data by maintaining appropriate technical and organisational measures.

1.4. This Site may contain links to other websites. Although we try to only insert links to websites that share our own standards regarding data protection, we are neither responsible for the contents nor for the policy regarding data protection of those websites. This Privacy Notice only applies to data processed by iBanFirst. When you click on links on this Site, we strongly advise to read the privacy notice on the relevant websites first, before sharing any personal data.

1.5. If you provide us with the personal data of other individuals, you guarantee that the other individual was informed of this Privacy Notice, and that insofar as a certain processing requires the consent of the data subject, you have obtained the relevant consent from the data subject for this processing by us.

1.6. This Site may use cookies and/or other similar technologies. More information can be found in our [Cookie Notice](#).

## 2. Personal data processed by iBanFirst

2.1. The personal data that we collect and process, can include the following elements:

<b>Site Users</b>	electronic identification information including IP addresses, type of browser personal characteristics (e.g. language, ...) the information you provided in forms (e.g. feedback or contact forms), to customer services and through any other services and communication channels that we offer information on how you use our products, services and Site including number of times you
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	<p>visited the Site, dates you visited the Site and the amount of time you spent viewing the Site, pages viewed, URL-clickstream, page interaction.</p> <p>information on how you interact with us and other similar information</p> <p>technical information including (mobile) communication information, information about the device you use to access our Site, your browser type and browser plug-in type, operating system, IP address, domain name, date and time of an online request and error codes generated while your browser is in contact with our Site.</p>
<b>Customers and Prospects</b>	<p>standard identification and contact information including name, address, phone number, email address, country of residence, date and place of birth</p> <p>VAT or TIN number</p> <p>personal characteristics (e.g. language, ...)</p> <p>financial information including bank account number</p> <p>information about currency transactions, including the currency used</p> <p>profession and job title</p> <p>professional information from social media (LinkedIn) if accessible to us</p> <p>information you provide in forms (e.g. feedback or contact forms), to customer services and through any other services and communication channels that we offer</p> <p>information on how you use our products and services</p> <p>recordings of phone calls in relation to the existence, content and/or conditions of transactions</p> <p>information you need to provide us about your related parties, such as directors, shareholders, ultimate beneficial owners, which may include their name, address, phone number, email address and financial information. It is your responsibility to obtain such related parties' consent before providing us with their information.</p>
<b>Suppliers and Partners</b>	<p>standard identification and contact information including name, address, professional phone</p>

	number, professional email address, country of residence, date and place of birth VAT or TIN number personal characteristics (e.g. language, ...) financial information including bank account number profession and job title professional information from social media (LinkedIn) if accessible to us information you provide in forms (e.g. feedback or contact forms), to customer services and through any other services and communication channels that we offer information and details on how you use our products and services information about related parties, such as directors, shareholders, ultimate beneficial owners, which may include their name, address, phone number, email address and financial information. It is your responsibility to obtain such related parties' consent before providing us with their information
<b>Visitors of our premises</b>	standard identification and contact information including name and email address date and duration of your visit of our premises camera footage
<b>Other stakeholders</b> (see further specification under section 3)	standard identification and contact information including name, address, phone number, email address, country of residence

2.2. We can obtain such personal data directly because you have given it to us (e.g. via a form on the Site, by contacting us), or indirectly because others have given them to us (for Site Users: through our use of cookies and similar technologies on the Site; for Suppliers, Customers and Prospects: from your organization or from third party service providers (e.g. through introducing brokers, sanctions screening tools, credit agencies,... ); through the purchase of a business or a business' assets; or for Customers: from certain information from social media) or because they are publicly available. We can also obtain your personal data through the way in which you interact with us.

### 3. Purpose of processing

3.1. The purposes of these processing activities and the corresponding legal bases are:

Purpose	Legal basis	Category of data subjects
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<p><b>Present our Site and provide you with information</b> on our products, services and deliver support that you request from us, for example through the contact form on this Site.</p>	<p>Where we obtain your consent before processing such information, we will rely upon this consent as our basis for processing.</p> <p>In other cases, this processing is necessary for our legitimate interest in building and maintaining a good business relationship and providing adequate answers to queries.</p>	<p>Site Users</p>
<p><b>Providing our products and our services:</b> Meet our obligations and enforce our rights arising from any contracts with you or your organisation, including in order to provide the products and services that you ordered or to which you subscribed, in the context of delivery of the product and/or service, logistics, sending transactional communications, as well as accounting and billing.</p> <p>To meet our legal obligations towards you or your organization regarding pre-contractual obligations.</p>	<p>Where this processing is required to comply with a legal obligation, we will rely on this legal obligation for this processing.</p> <p>Where the contract has been entered into directly by you, the processing may also be necessary for the performance of a contract between you and iBanFirst.</p> <p>In other cases, the processing will be necessary for iBanFirst's legitimate interest in processing data of individuals in the context of our contracts with your organisation.</p>	<p>Customers and Prospects</p>
<p><b>To create your account on the Site:</b> We use personal data to create your account on the Site which allows you to access certain pages of the Site, place an order and use certain of the Site's features.</p>	<p>Where a contract has been entered into directly by you, the processing may also be necessary for the performance of a contract between you and iBanFirst.</p> <p>In other cases, the processing will be necessary for iBanFirst's legitimate interest in processing data of individuals in the context of our contracts with your organisation or our legitimate interest in developing our business relationship and allowing you to create an account.</p>	<p>Customers</p>

<b>Customer management:</b> In order to provide optimal customer experience, we process certain personal data for the purpose of customer management.	This processing is based on our legitimate interest in knowing our customer and maintaining our relationship with you, with a view to providing an excellent customer experience.	Customers
<b>To communicate with you:</b> In relation to our products and services, queries and/or complaints about our Site, products or services, we process personal data to respond to such requests. When you contact us by phone, we may record these calls in some circumstances, including (see further specification under section 3.2).	The processing will be necessary for our legitimate interests in processing personal data to answer questions or requests and/or to generally communicate with you and improve our relationship with you in this way. Please refer to section 3.2 in relation to recording of phone calls.	Customers and Prospects
<b>Supplier and Partner management:</b> Management of orders placed and payment of suppliers. Prospecting of potential suppliers and their evaluation.	This processing is necessary for iBanFirst's legitimate interest in processing data of individuals in the context of our contracts with your organisation. Where the contract has been entered into directly with you, the processing may also be necessary for the performance of a contract between you and iBanFirst. In relation to prospective suppliers, we carry out this processing on the basis of our legitimate interest in establishing new business relationships.	(Prospective) Suppliers and Partners
<b>Comply with legal obligations</b> under the applicable legislation in relation to the activities of iBanFirst.	This processing is necessary for any legal obligation to which iBanFirst is subject, such as EU Directive 2015/849 and or The Money Laundering Regulation 2019 (MLR 2019) on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, as may be amended and/or repealed from time to time and its applicable transpositions , applicable sanctions screening regulations and regulatory reporting requirements. When responding to your data subject requests under the GDPR, the	Customers, Prospects, Suppliers, Partners, and other relevant stakeholders (such as related parties)

	processing is necessary to comply with a legal obligation imposed on iBanFirst.	
<b>To send you (personalized) marketing</b> or commercial information via the Site, post or via email	This processing is necessary for our legitimate interest in ensuring that our customers and/or our prospective customers are kept up-to-date with information about our services and helping us understand your interests, personalize our interactions with you, and develop our business relationship, as this helps us to preserve our business operations or grow our business (also referred to as “soft opt-in”). Where we are required by law to obtain your consent before processing such information, we will rely upon your consent as our basis for processing.	Site Users, Customers and Prospects
<b>Detecting, preventing and combating fraud and illegal</b> uses, abuse, spam, security incidents and other harmful activity or to comply with <b>government or court orders</b> .	This processing is necessary to comply with a legal obligation to which iBanFirst is subject. If no such legal obligation applies, the processing will be necessary for iBanFirst’s legitimate interest to deal with fraud, crime and abuses.	Site Users, Customers and Prospects, Suppliers, Partners
<b>Management of disputes</b> including the repayment of amounts due.	The processing will be necessary for iBanFirst’s legitimate interest to defend itself in and out of court and to establish and pursue legal claims.	Site Users, Customers and Prospects, Suppliers, Partners
<b>Public relations</b> and relationships with stakeholders.	The processing will be necessary for iBanFirst’s legitimate interest in establishing and maintaining good business relationships with all stakeholders that are relevant for conducting its activities.	Relevant stakeholders
Registration of visitors for <b>access control</b> purposes when you visit iBanFirst’s premises.	The processing will be necessary for iBanFirst’s legitimate interest in applying high standard security measures for its premises. Where this processing is required to comply with a legal obligation, we	Visitors

	will rely on this legal obligation for this processing.	
Theft prevention and protection of the assets of iBanFirst by means of camera surveillance on iBanFirst's premises	The processing will be necessary for iBanFirst's legitimate interest to protect its commercial and financial interests, to ensure confidentiality of its business information and to secure its premises. Where this processing is required to comply with a legal obligation, we will rely on this legal obligation for this processing.	Visitors
<b>Administer our Site</b> and conduct internal operations, including for troubleshooting, data analysis, testing, research, statistical and survey purposes, for example by using cookies or similar technologies.	We will obtain your consent before processing such information where required. In other cases, this processing is necessary for our legitimate interest to maintain and administer our Site.	Site Users
Ensure that we <b>present our Site</b> content in the most effective manner for you and for your computer, in particular by using cookies or similar technologies.	We will obtain your consent before processing such information.	Site Users
<b>Improve</b> our Site, products or services, marketing, or customer relationships and experiences, in particular by using cookies or similar technologies to process statistics that can be used as a basis for this evaluation.	This processing is necessary for our legitimate interest in improving our products or services and your experience while using the Site, as this helps us to preserve our business operations or grow our business. Where we are required by law to obtain your consent before processing such information, we will rely upon your consent as our basis for processing.	Site Users
Evaluating and executing mergers, acquisitions, reorganisations or other <b>corporate transactions</b> .	The processing for these purposes is necessary for the legitimate interest of iBanFirst in carrying out the said business transactions in order to implement our business strategies or grow our business.	Site Users, Customers and Prospects, Suppliers, Visitors



3.2. Insofar as we record phone calls with Customers, it should be noted that we record those phone calls for various purposes and based on different legal bases, as specified hereunder:

#### 3.2.1 Europe

Phone calls from our account managers and dealers will always be recorded. We record those phone calls for evidentiary purposes in the framework of a commercial transaction, as specified at the beginning of our commercial relationship. This processing is necessary for our legitimate interest to collect evidence regarding commercial transactions. These recordings are stored for 10 years as from the end of the contractual relationship.

Phone calls between Customers and other iBanFirst personnel (e.g. sales or customer services) will only be recorded after you have been informed thereof prior to the start of the recording and upon obtaining your consent for the recording. The purpose of recording these phone calls is to enable us to provide internal trainings which help us to improve our services and customer experience, as well as any other specific purpose of which you might be informed prior to the start of the recording. These recordings are stored for a maximum period of 130 days as from the date of recording.

#### 3.2.2 UK

Phone calls from our account managers and dealers will always be recorded. We record those phone calls for evidentiary purposes in the framework of a commercial transaction, as specified at the beginning of our commercial relationship. This processing is necessary for our legitimate interest to collect evidence regarding commercial transactions. These recordings are stored for 6 years as from the end of the contractual relationship.

Phone calls between Customers and other iBanFirst personnel (e.g. sales or customer services) will only be recorded after you have been informed thereof prior to the start of the recording and upon obtaining your consent for the recording. The purpose of recording these phone calls is to enable us to provide internal trainings which help us to improve our services and customer experience, as well as any other specific purpose of which you might be informed prior to the start of the recording. These recordings are stored for a maximum period of 130 days as from the date of recording.

3.3. In addition, if we use your information for purposes other than those mentioned above we will notify you of these purposes before using your information and obtain your consent (where necessary).

3.4. Unless otherwise indicated, the provision of personal data to iBanFirst is not a statutory or contractual requirement and you are not obliged to provide your personal data to us. If you decide not to provide your personal data, we might, in some instances, not be able to provide you with all features of the Site or a product or service. Completion of any forms or surveys is entirely voluntary, although you may be required to submit certain personal data to iBanFirst to allow us to adequately handle your inquiries or requests.

### 4. Disclosure of personal data to third parties

4.1. We may disclose some of your personal data to the following third parties who reasonably need access to those data in view of achieving one or several of the above-mentioned purposes to:



external service suppliers, third party subcontractors, partners to conduct verification of your identity as required under applicable law, within the framework of the execution of customer contracts to support the provision of iBanFirst products and services and/or the implementation of measures to abide by the GDPR (including but not limited to fighting against fraud, fighting against money laundering and terrorist financing), IT service providers, translation agencies, security companies, marketing agencies, etc.;

law enforcement and public authorities, in the context of requests from law enforcement and competent authorities in accordance with the applicable legislation;

potential or future buyers of iBanFirst (or any iBanFirst assets);

external professional advisors (e.g. auditors, lawyers or consultants of iBanFirst

any company of the iBanFirst group, i.e. our affiliates, our representative offices, our subsidiaries, our ultimate holding company and its subsidiaries.

4.2. Your personal data collected by iBanFirst may be stored and transferred outside the EEA/UK. Some third parties who receive your personal data may be located in a country outside the EEA/UK in which the legislation does not offer the same degree of data protection. We will ensure that your personal data is only transferred to parties that apply an appropriate level of data protection (e.g. for the EU GDPR where the European Commission has issued an adequacy decision or by including the so-called EU standard contractual clauses in the agreement with the recipient and subject to an appropriate data transfer impact assessment; for the UK GDPR where the UK Secretary of State has issued an adequacy regulation or by including the UK supervisory authority's international data transfer agreement or international data transfer addendum to the EU Standard contractual clauses in the agreement with the recipient and subject to an appropriate data transfer impact assessment). You can contact us to receive a copy of, or request information about, the appropriate safeguards or transfer mechanism that apply to the transfer of your personal data using the contact details in section 7.

## **5. Duration of processing**

5.1. Your personal data is stored by iBanFirst only for the time necessary to achieve the above-mentioned purpose, taking into account the application of legal obligations, statutory limitation or retention periods (including in the context of the application of the EU Directive 2015/849 and or MLR 2019 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, as may be amended and/or repealed from time to time and its applicable transpositions, as well as any personal data required for iBanFirst to establish, exercise or defend legal claims).

5.2. In the event your personal data is collected based on your consent, we use it only for the period of time that your consent is given. As soon as your consent is withdrawn, your personal data are kept for the minimum period necessary for the fulfilment of the measures necessary for the implementation of your right.

5.3. For the retention periods applicable to phone call recordings with Customers, please refer to section 3.2 above.

5.4. The applicable storage period for personal data collected through cookies or similar technologies on this Site can be found in our [Cookie Notice](#).

5.5. Camera footage is kept for maximum one month, unless we need to retain the footage for longer for example where it is required as evidence to prove a crime, damage or nuisance or to identify an offender, public disorder, witness or victim.

## **6. Your rights as a data subject**

6.1. You have several rights regarding the personal data that we process. If the relevant conditions of the GDPR are met, you have the right:

### **a. to withdraw your consent**

Insofar the processing activity is based on your consent, you have the right to withdraw your consent for such processing activity at any time. This withdrawal will however not affect the lawfulness of the processing of your personal data for the period prior to the time of this withdrawal and processing activities based on another legal basis.

### **b. to access your personal data**

You have the right to access to the personal data iBanFirst has about you, information on the processing of these personal data and to receive a copy thereof. 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 deal with your request without undue delay or within one month, subject to an extension of up to a further two months, where required and permitted by applicable laws. This information will be free of charge unless your request is manifestly unfounded or excessive whereby a fee may be required prior to release of your information or we may refuse to comply with the request.

### **c. to ask us to rectify, erase or restrict your personal data**

You are entitled to request us to rectify if you think it is incorrect or incomplete or to erase your personal data, in principle free of charge. You acknowledge that, in case of a request to erase your personal data, this is subject to certain exemptions and in the event of erasure certain services and products might not be available to you anymore. You may also request us to restrict the processing of your personal data, for example, when we check the accuracy of your personal data.

### **d. to data portability**

The personal data that you provided to iBanFirst can be provided to you in a clear, structured, readable, and commonly used machine-readable format and can be transferred to a third party (insofar the processing is based on consent or the performance of an agreement).

### **e. to object to the processing of your personal data**

You may at any time object to the processing of your personal data by iBanFirst for direct marketing purposes. In other cases, you have a right to object on grounds relating to your particular situation (insofar the processing is based on legitimate or public interest).

### **f. to lodge a complaint with a supervisory authority**

If you believe that iBanFirst did not act in accordance with the legislation concerning the processing

of your personal data, you have the right to file a complaint with the competent supervisory authority of your place of habitual residence or work or where an alleged infringement took place.

Country or Region	Entity	Registered Office and Details	Data Protection Authority
EEA	Data Controller: iBanFirst SA	IBANFIRST SA, 350 Avenue Louise, 1050 Brussels, Belgium. Company number: BE 0849.872.824	Belgian Data Protection Authority ( <a href="http://www.dataprotectionauthority.be/">www.dataprotectionauthority.be/</a> )  You can find the list of other EU data protection authorities and their contact details at ( <a href="https://edpb.europa.eu/about-edpb/about-edpb/members_en">https://edpb.europa.eu/about-edpb/about-edpb/members_en</a> )
UK	Data Controller: iBanFirst Limited	6th Floor Dashwood House, 69 Old Broad Street, London, EC2M 1QS.  Company registration number: 06260585  Registration number with the UK Information Commissioner's Office (ICO): Z3444720	Information Commissioner's Office (ICO) ( <a href="http://www.ico.org.uk">www.ico.org.uk</a> )

6.2. If you have questions about your data protection rights, or to exercise your rights or for any request for additional information, please write to [privacy@ibanfirst.com](mailto:privacy@ibanfirst.com).

## 7. iBanFirst Contact details

If you have any questions regarding this Privacy Notice or this Site or you wish to exercise your data protection rights, you can contact us in the following ways:

- **By e-mail:** [dpo@ibanfirst.com](mailto:dpo@ibanfirst.com)
- **By post in EEA:** IBANFIRST SA, att. Privacy and Legal department 1050 Brussels, 350 Avenue Louise.
- **By post in the UK:** iBanFirst Limited, att. Privacy and Legal department, 6th Floor Dashwood House, 69 Old Broad Street, London, EC2M 1QS.

**8. Modifications to this Privacy Notice**

We can modify this Privacy Notice at any time. In order to keep you informed of the latest modification of the Privacy Notice, we shall adapt the revision date on top of this page each time it is modified. The modified Privacy Notice shall enter into force as of that date.

Please consult this page regularly to keep informed of any modifications and/or additions.