

ACCOUNT INFORMATION SERVICES AND PAYMENT INITIATION SERVICES PRIVACY POLICY

The account information services and payment initiation services pursuant to the second Payment Services Directive (PSD2) (Services) are provided to you by the entities listed as Controllers below, each a "Bank". This Policy is issued by J.P Morgan Chase Bank N.A, on behalf of itself, its branches, its subsidiaries and its affiliates and applies to the entities listed as Controllers below.

This Policy uses certain defined terms:

- "Controller" is an entity that decides how and why personal data is processed and is usually responsible for complying with applicable data protection laws.
- "personal information" is information that is about any individual, or from which any individual is identifiable.
- "process, processed or processing" encompasses the collection, use, storage and analysis of data.

In order to perform our role, the Bank will obtain and use personal information about you and this Privacy Policy sets out how the Bank will obtain, use and protect your personal information.

This version of the Privacy Policy is effective from 2 October 2020. It may change from time to time.

How does the Bank collect personal information about you?

You are a client of a customer of the Bank (Customer). The Bank receives personal information about you directly from you or from third parties, including your online payment account provider (with your explicit consent under PSD2) and the Customer. The Bank will use such personal information for the purposes detailed below.

What personal information may the Bank collect about you?

The Bank will collect and process the following categories of personal information, including but not limited to:

Account Information Services

- information required to initiate the account information request e.g. your IP address and device type (operating system);
- information accessible from your online payment account under PSD2, e.g. your account details, transactional information, sort code, account number/IBAN and any other personal information you have consented for your online payment account provider to provide pursuant to PSD2; and
- other details that you, or a representative acting on your behalf, may provide to the Bank through any correspondence or verbal communication.

Payment Initiation Services

- information required to initiate a payment from your online payment account to the Customer under PSD2, e.g. your account number, IP address and device type (operating system); and
- other details that you, or a representative acting on your behalf, may provide to the Bank through any correspondence or verbal communication.

If the Bank does not collect, you do not provide your personal information to us, or you do not consent to the Bank accessing your information with your online payment account provider, we may not be able to provide you the Services.

How may the Bank use your personal information?

The Bank uses your personal information for the purposes of:

- providing you the Services, including disclosing your personal information to the Customer;
- communicating with you;
- recording our communications with you including telephone calls and written correspondence;
- complying with our legal and regulatory obligations. These obligations include the Bank's responsibility to conduct certain checks (including to confirm your identity and screening against Government sanctions lists), to monitor transactions for any suspicious activity, and keep records relating to you and Services;
- responding to requests for information from regulatory bodies and law enforcement officials;

- performing our internal business functions including managing, auditing and updating our records; and
- understanding your use of the Services, your actions and behaviours to improve and develop the Services offered to you and performing data analysis to support the purposes and activities above.

On what basis does the Bank use your personal information?

The Bank uses your personal information:

- in order for it to perform its contractual obligations with you (set out in the Account Information Services and Payment Initiation Services terms and conditions);
- to comply with its legal and regulatory obligations; and
- to meet its legitimate interests including performing business functions such as managing, auditing and updating our records, preventing fraud or helping others prevent fraud, data analysis to support the purposes and activities described above, communicating and co-operating with others that play a role in providing the Services or conducting legal proceedings.

How does the Bank keep your information safe?

The Bank takes a number of steps to protect the privacy and security of your information, for example we maintain physical, electronic, technical and procedural safeguards.

How long will the Bank keep your personal information?

The Bank will only keep your personal information for as long as it is necessary to comply with applicable laws. In most cases this will be 11 years from the date the Services are provided to you.

After this period, the Bank will:

- erase your personal information; or
- archive your personal data so that it is beyond use.

Who may the Bank share your information with?

The Bank may share your personal information with:

- The Customer;
- third party service providers that help the Bank provide/administer the Services
- other members of the Bank's group of companies that may assist the Bank in providing your Services;
- law enforcement agencies and fraud prevention agencies where the Bank is required to do so by law; and
- regulatory authorities.

The Bank will not sell your information to anyone.

If there is a transfer of the Bank's business related to your Services from the Bank to another bank, the Bank may also share your personal information with that bank or to any advisors or insurers involved in the negotiation of that transfer.

If we engage a third party service provider to process your personal information, the service provider will be subject to binding contractual obligations to: (i) only process the personal information in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the personal information; together with any additional requirements under applicable law.

International transfers of personal information

In order for the Bank to provide you the Services, the Bank may process some data, including personal information outside of the jurisdiction in which you are located. This is because some banking functions are located in other countries that may have different laws and data protection compliance requirements, including data protection laws of a lower standard to those that apply in the country in which you are located.

Where we transfer your personal information to other countries, we do so on the basis of:

- adequacy decisions;
- our Binding Corporate Rules;
- suitable Standard Contractual Clauses; or
- other valid transfer mechanisms.

What are your rights with respect to your personal information?

Under applicable law, you have the right to:

- request a copy of your personal information;
- request the correction and/or deletion of your personal information, request the restriction of the processing of your personal information or object to that processing. Please note that if the Bank cannot collect or process your personal information, we may not be able to provide you the Services;
- request receipt or transmission to another organisation, in a machine-readable form, of the personal information that you have provided to the Bank; or
- complain to a Data Protection Authority if your privacy rights are violated, or if you have suffered as a result of unlawful processing of your personal information.

Contacts

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data by J.P. Morgan, please contact:

JPMC EMEA Privacy,
JPMorgan Chase Bank, National Association,
25 Bank Street, Canary Wharf, London E14 5JP, UK;
Email: Data.privacy@jpmorgan.com

If you would like to contact the JPMC Data Protection Officer, please send an email to: EMEA.Privacy.Office@jpmchase.com

Controllers

For the purposes of this policy, the relevant controllers are:

Controller	Contact details
JPMorgan Chase Bank, N.A., London Branch	25 Bank Street Canary Wharf London E14 5JP