

EMEA DATA PRIVACY POLICY

Unless advised otherwise, this privacy statement applies to the direct and indirect subsidiaries of JPMorgan Chase & Co. that process personal data in the Europe, Middle East and Africa (“EMEA”) region, which are referred to in this statement either individually or collectively as “JPMorgan”, “we” or “us”.

1. JPMorgan may collect, hold, use and disclose (‘process’) information about individuals* which may constitute personal data (including sensitive personal data) under the EU Data Protection Directive and implementing laws, and the laws of other European, Middle East and African countries.
2. The personal data may be processed for purposes including:
 - a. Administering relationships and related services.
 - b. Operational purposes, credit assessment (including setting credit limits), and statistical analysis (including behaviour analysis).
 - c. Conducting market or customer satisfaction research.
 - d. Providing individuals with information concerning products and services which we believe will be of interest.
 - e. Compliance with any requirement of law, regulation, associations, voluntary codes we decide to adopt, or good practice, anywhere in the world.
 - f. Confirming and verifying an individual’s identity (this may involve the use of a credit reference agency or other third parties acting as our agents) and to conduct due diligence. We may also screen against publicly available government and/or law enforcement agency sanctions lists.
 - g. The detection, investigation and prevention of fraud and other crimes or malpractice.
 - h. For the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings), for obtaining legal advice or for establishing, exercising or defending legal rights.
3. The personal data may be disclosed:
 - a. To any organisation in our group of companies, their agents, auditors, service providers, regulators, governmental or law enforcement agencies or any person we reasonably think necessary for the processing purposes outlined above.
 - b. To actual or potential purchasers of parts of our business, and their respective advisers and insurers, and in relation to the transfer of our contractual rights and/or obligations.
 - c. If we or any person to whom we disclose personal data otherwise have a right or duty to disclose the personal data, or are allowed or compelled by law to do so. For example, financial institutions and payments and messaging service providers may from time to time be required, under subpoena or otherwise, to provide certain transaction information to authorities or other official bodies, whether located in the European Union or overseas, to assist in the prevention of terrorism, money laundering and other crimes.

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4. If we undertake transactions or other services that involve the disclosure of personal data on behalf of a client or counterparty (including, without limitation, disclosures to third parties outside EMEA), it shall be the responsibility of such client or counterparty to ensure that it has all necessary rights to permit us to process and disclose the personal data accordingly.
5. We operate globally and therefore personal data may be processed and disclosed as described above in any country in which we conduct business or have a service provider. This may include some countries that do not provide the same statutory protection for Personal Data as the EU Data Protection Directive and implementing legislation or the laws of other European, Middle East and African Countries, where they may apply.
6. We may contact individuals by mail, e-mail, SMS, telephone and other electronic means to provide information on products and services that we believe will be of interest, unless we receive an objection to receiving such information. Anyone who does not wish to receive such communications from us should contact our relevant Relationship Manager.
7. To the extent permitted by applicable law, we may record and monitor electronic communications to ensure compliance with our legal and regulatory obligations and internal policies and for the purposes outlined above.
8. Individuals about whom we process personal data may request a copy of the personal data held in relation to them by us. We may, where allowed by law, charge a fee for this. If any personal data is found to be wrong, the individual concerned has the right to ask us to amend, update or delete it, as appropriate. In some circumstances individuals also have a right to object to the processing of their personal data.
9. This privacy statement may change from time to time and should be reviewed periodically.

* It should be noted that the concept of personal data in the data protection laws of Austria and Italy includes information about corporate bodies as well as individuals.